

EXHIBIT 241

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION
4

5 -----x
6 IN RE: NATIONAL PRESCRIPTION) Case No.
7 OPIATE LITIGATION) 1:17-MD-2804
8 APPLIES TO ALL CASES) Hon. Dan A. Polster
9 -----x

10 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
11 CONFIDENTIALITY REVIEW
12
13 VIDEOTAPED DEPOSITION OF BLAINE M. SNIDER

14 WASHINGTON, D.C.

15 THURSDAY, NOVEMBER 8, 2018

16 8:34 A.M.
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24 Reported by: Leslie A. Todd

1 Deposition of BLAINE M. SNIDER, held at the
2 offices of:

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4

5

COVINGTON & BURLING, LLP

6

One City Center

7

850 10th Street, N.W.

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Washington, DC 20001-4956

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Pursuant to notice, before Leslie Anne Todd,

14

Court Reporter and Notary Public in and for the

15

District of Columbia, who officiated in

16

administering the oath to the witness.

17

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1 A P P E A R A N C E S

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20 DANIEL HOLMSTOCK, Videographer

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24

1 C O N T E N T S

2	EXAMINATION OF BLAINE M. SNIDER	PAGE
3	By Mr. Bogle	17, 489
4	By Mr. Collins	453, 514

Group	U.S. should take action	U.S. should not take action	U.S. should take action, but only if other countries do first
All respondents	78%	18%	4%
U.S. only	82%	15%	3%
U.S. and other countries	75%	20%	5%
Other countries only	65%	30%	5%

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	Sub-category 2.2	50
	Sub-category 2.3	60
Category 3	Sub-category 3.1	70
	Sub-category 3.2	80
	Sub-category 3.3	90
Category 4	Sub-category 4.1	100
	Sub-category 4.2	110
	Sub-category 4.3	120
Category 5	Sub-category 5.1	130
	Sub-category 5.2	140
	Sub-category 5.3	150
Category 6	Sub-category 6.1	160
	Sub-category 6.2	170
	Sub-category 6.3	180
Category 7	Sub-category 7.1	190
	Sub-category 7.2	200
	Sub-category 7.3	210
Category 8	Sub-category 8.1	220
	Sub-category 8.2	230
	Sub-category 8.3	240
Category 9	Sub-category 9.1	250
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1 P R O C E E D I N G S

2 -----

3 THE VIDEOGRAPHER: We are now on the
4 record. My name is Daniel Holmstock. I am the
5 videographer for Golkow Litigation Services.
6 Today's date is November 8, 2018, and the time on
7 the screen is 8:34 a.m.

8 This deposition is being held at the law
9 offices of Covington & Burling, LLP, at 850
10 10th Street, Northwest, in Washington, D.C., in
11 the matter of In Re: National Prescription Opiate
12 Litigation. It is pending before the United
13 States District Court for the Northern District of
14 Ohio, Eastern Division.

15 The deponent today is Mr. Blaine Snider.
16 Counsel will be noted on the
17 stenographic record. The court reporter is Leslie
18 Todd, who will now administer the oath.

19 BLAINE M. SNIDER,
20 and having been first duly sworn,
21 was examined and testified as follows:

22 CROSS EXAMINATION

23 BY MR. BOGLE:

24 Q Can I get your full name, sir?

1 A Blaine Matthew Snider.

2 Q And am I correct that you're currently
3 employed with McKesson?

4 A Yes.

5 Q Okay. And have you ever been deposed
6 before?

7 A No.

8 Q Okay. Just a few basic ground rules
9 that might help both of us here today. I'm going
10 to be asking you some questions, and if you don't
11 understand the question I ask or don't hear it,
12 it's perfectly okay for you to ask me to repeat or
13 rephrase the question. Okay?

14 A Okay.

15 Q If you need a break at any point in
16 time, just let me know or your counsel know.
17 Happy to take a break whenever you need it. All
18 I'd ask is if I've got a question pending, that
19 you answer that question, and then we can break
20 for whenever you want.

21 And also I'm going to ask you questions,
22 you're going to provide answers. I'd ask that we
23 try not to talk over each other. So I'll ask my
24 question, try to give you ample opportunity to

1 answer before I ask my next question. Is that
2 fair?

3 A Okay.

4 Q Okay. And how long have you been with
5 McKesson?

6 A Almost 40 years.

7 Q Okay. Am I correct that you currently
8 hold the director of operations position at the
9 New Castle Distribution Center?

10 A Yes.

11 Q Okay. How long have you held that
12 specific position?

13 A Eighteen -- eighteen years.

14 Q Okay. What was your job at McKesson
15 prior to that?

16 A I was distribution center manager in
17 Sewickley, Pennsylvania, and North Canton, Ohio.

18 Q Okay. How long did you have that role?

19 A About three years.

20 Q How about prior to that?

21 A I was operations manager in Cincinnati,
22 Ohio, and North Canton previous to that.

23 Q How long did you hold that position?

24 A Oh, I can't remember now. Eight, ten

1 years, I guess.

2 Q Okay. What was your job prior to that
3 at McKesson, just the title?

4 A I started as a supervisor almost 40
5 years ago.

6 Q Okay. So would it be fair to say, just
7 doing the rough math here, that you have nearly 30
8 years of experience as a distribution center
9 operations manager at McKesson?

10 A Yes.

11 Q Okay. Now, McKesson itself as an entity
12 has, as I understand it, 37 distribution centers
13 around the country; is that right?

14 MR. COLLINS: Objection to the form.

15 THE WITNESS: I can't answer to -- it
16 sounds like you're including med-surg or something
17 else. I know there's 28 distributions centers for
18 U.S. pharma.

19 BY MR. BOGLE:

20 Q Okay. And New Castle is one of those 28
21 distribution centers for U.S. pharma, correct?

22 A Yes.

23 Q And just so I understand, as director of
24 operations for New Castle, it would be your

1 general responsibility to run the day-to-day
2 operations for the facility, correct?

3 MR. COLLINS: Objection. Form.

4 THE WITNESS: I'm in charge of the
5 facility, yes.

6 BY MR. BOGLE:

7 Q Right. So it's fair to say that you're
8 the highest ranking McKesson employee at New
9 Castle that has responsibility exclusive to that
10 distribution center, right?

11 MR. COLLINS: Objection to form.

12 THE WITNESS: Well, I'm not sure. I
13 have a VP/GM I report to, but I run the
14 distribution center.

15 BY MR. BOGLE:

16 Q Who do you report to?

17 A Brian Ferreira, the VP/GM.

18 Q When it comes to decisions specific to
19 the operations of New Castle, would it be fair to
20 say that the buck stops with you?

21 MR. COLLINS: Objection to form, vague.

22 THE WITNESS: I don't think so.

23 BY MR. BOGLE:

24 Q Okay. Who do you think the buck stops

1 with at New Castle?

2 MR. COLLINS: Same objection.

3 THE WITNESS: I don't know the buck. I
4 know I'm in charge of the distribution center
5 operations, and I have a boss who is the VP/GM.

6 BY MR. BOGLE:

7 Q Okay. When you say you're responsible
8 for distribution center operations, what do you
9 think that that -- that entails?

10 A In charge of the distribution center and
11 the employees, and the pick, pack and ship of that
12 operations.

13 Q When you say "pick, pack and ship," what
14 does that mean?

15 A The day-to-day filling of orders for our
16 customers out of the New Castle DC.

17 Q Okay. And when it comes to pills that
18 are distributed from New Castle, you would agree
19 with me that it's your ultimate responsibility to
20 make sure that those go to the proper customers
21 for the proper purpose.

22 MR. COLLINS: Objection. Compound,
23 form.

24 THE WITNESS: We make sure the orders

1 are correct, accurate, billed correctly, shipped
2 correctly, on time.

3 BY MR. BOGLE:

4 Q And your job responsibilities also
5 include, when it comes to controlled substances,
6 making sure that the customers purchasing are
7 purchasing for a legitimate medical purpose,
8 correct?

9 MR. COLLINS: Objection. Form, calls
10 for a legal conclusion, lacks foundation.

11 THE WITNESS: I can't say for the
12 customers all the time. I can say that I follow
13 the Code of Federal Regulations.

14 BY MR. BOGLE:

15 Q Okay. And part of the Code of Federal
16 Regulations, when it comes to the Controlled
17 Substances Act, talks about the distributor's
18 responsibility to ensure that they're supplying
19 drugs to customers who are buying it for a
20 legitimate medical purpose, right?

21 MR. COLLINS: Objection. Form, asked
22 and answered --

23 THE WITNESS: Can you repeat that?

24 MR. COLLINS: -- calls for a legal

1 conclusion.

2 Please let me finish my objections.

3 BY MR. BOGLE:

4 Q When it comes to the Controlled
5 Substances Act, you understand that part of that
6 act requires that controlled substances that are
7 distributed to customers are being provided for a
8 legitimate medical purpose, correct?

9 MR. COLLINS: Objection. Form, calls
10 for a legal conclusion.

11 THE WITNESS: I can't --

12 MR. COLLINS: Foundation.

13 THE WITNESS: I can't say a legitimate
14 medical purpose. I don't know that phrase. I'm
15 sorry.

16 BY MR. BOGLE:

17 Q You've never heard that phrase?

18 A No.

19 Q Okay. You're a member of management at
20 the distribution center for New Castle, right?

21 A Yes.

22 MR. COLLINS: Objection to form.

23 BY MR. BOGLE:

24 Q And the distribution center management

1 at McKesson has the full responsibility for
2 ensuring the proper distribution of controlled
3 substances, correct?

4 MR. COLLINS: Objection to form, calls
5 for a legal conclusion, vague.

6 THE WITNESS: Can you repeat the
7 question, please?

8 MR. BOGLE: Can you repeat back, Court
9 Reporter?

10 (Whereupon, the requested record
11 was read.)

12 MR. COLLINS: Same objections.

13 THE WITNESS: I believe so, yes.

14 BY MR. BOGLE:

15 Q Okay. And that's a job you take
16 seriously, right?

17 A Yes.

18 Q Okay. Just make sure you speak up a
19 little bit. I'm having sometimes a little trouble
20 hearing you.

21 A Okay.

22 Q Is that "yes"?

23 A Yes.

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Action	Percentage of Respondents
Reduce greenhouse gas emissions	93%
Invest in research and development of clean energy technologies	89%
Protect and restore natural resources	87%
Improve energy efficiency	86%
Transition to renewable energy sources	85%
Set and enforce emissions standards	84%
Invest in public transportation	83%
Improve building codes	82%
Invest in infrastructure	81%
Improve water conservation	80%
Invest in clean energy research	79%
Improve energy efficiency in homes and businesses	78%
Invest in clean energy infrastructure	77%
Improve energy efficiency in homes and businesses	76%

15 BY MR. BOGLE:

16 Q You would agree with me that protecting
17 the health and safety of the public is the most
18 important consideration for any distributor of
19 pharmaceutical products, correct?

20 MR. COLLINS: Objection. Form,
21 foundation, calls for a legal conclusion, argue --

22 MR. BOGLE: I believe you're supposed to
23 just --

24 MR. COLLINS: Argumentative.

1 MR. BOGLE: -- stick to form objections.
2 You're going beyond that considerably here.

3 MR. COLLINS: No, my objection is
4 legitimate. Your question wasn't. So my
5 objection stands. It's the form, calls for a
6 legal conclusion --

7 MR. BOGLE: I believe the protocol calls
8 for just form objections. Not speaking objections
9 beyond that.

10 MR. COLLINS: We have a phone here if
11 you want to make a call to the special master.

12 MR. BOGLE: Well, we can see if this
13 continues. We may have to.

14 MR. COLLINS: Listen, it's a proper
15 objection. Your question wasn't.

16 MR. BOGLE: I don't want to stop ten
17 minutes in.

18 BY MR. BOGLE:

19 Q I'll ask my question again.

20 Do you believe that protecting the
21 health and safety of the public is the most
22 important consideration for a distributor of
23 pharmaceutical products?

24 MR. COLLINS: Same objections. Form,

1 calls for a legal conclusion, foundation.

2 THE WITNESS: I can't answer to all the
3 health and safety of the public. I can answer to
4 the Code of Federal Regulations and my duties.

5 BY MR. BOGLE:

6 Q Okay. So do you believe that compliance
7 with the Federal Regulations is the most important
8 consideration for a distributor of pharmaceutical
9 products like McKesson?

10 MR. COLLINS: Objection to form.

11 THE WITNESS: I think it's a part of it.

12 BY MR. BOGLE:

13 Q Okay. Any more important part that you
14 can think of?

15 MR. COLLINS: Same objections. Form,
16 foundation.

17 THE WITNESS: Well, people.

18 BY MR. BOGLE:

19 Q People, what do you mean by that?

20 A My employees.

21 Q Okay. What about the people that you're
22 supplying the controlled substances to ultimately,
23 the end user?

24 MR. COLLINS: Object --

1 BY MR. BOGLE:

2 Q Do you think you have any responsibility
3 to those people?

4 MR. COLLINS: Objection. It's a
5 mischaracterization, lacks foundation, form.

6 THE WITNESS: I mentioned before about
7 on-time, accurate delivery to my customers.

8 BY MR. BOGLE:

9 Q Okay. So you think you have any
10 responsibility to the -- the end user, the person
11 who's purchasing from your customer?

12 MR. COLLINS: Objection to form, calls
13 for speculation.

14 THE WITNESS: I think I mentioned that
15 before. Yes.

16 BY MR. BOGLE:

17 Q Okay. And as to the ultimate purchaser,
18 the person who's going to go to your -- to the
19 pharmacy and purchase the drug, do you think that
20 McKesson has a responsibility to protect the
21 health and safety of those people?

22 MR. COLLINS: Same objections. Asked
23 and answered, form.

24 THE WITNESS: I can't answer for all of

1 McKesson. I can just answer for New Castle.

2 BY MR. BOGLE:

3 Q Sure. Then I'll rephrase it that way.

4 Do you think New Castle has such a responsibility?

5 MR. COLLINS: Same objections.

6 THE WITNESS: I don't -- can you repeat
7 the question?

8 BY MR. BOGLE:

9 Q Sure.

10 Do you think New Castle has a
11 responsibility for the health and safety of the
12 end user purchasing controlled substances
13 distributed by McKesson?

14 MR. COLLINS: Objection to form.

15 THE WITNESS: I can't say that I can
16 control that.

17 BY MR. BOGLE:

18 Q Okay. I didn't ask if control. I asked
19 if you had responsibility.

20 MR. COLLINS: Objection to form.

21 THE WITNESS: I can't be responsible for
22 someone that purchases drugs.

23 BY MR. BOGLE:

24 Q Okay. So you think you have no

1 responsibility for ensuring that people are
2 purchasing for legitimate medical purposes?

3 MR. COLLINS: Objection to form,
4 argumentative. Calls for a legal conclusion.

5 THE WITNESS: I can't answer to that.

6 BY MR. BOGLE:

7 Q You don't know?

8 A I can't answer to that.

9 Q Okay. When you say you can't answer
10 that, what -- what's keeping you from answering
11 that?

12 A I don't know.

13 Q Okay. Have you heard of the term
14 "diversion" when it comes to controlled
15 substances?

16 A Yes.

17 Q What does that term mean to you?

18 A It's in the supply chain where the
19 product could be diverted. Like inbound trucks
20 that come in, sometimes those are hijacked, or in
21 the building to make sure security is there.
22 There's a chance for diversion there. And in the
23 truck drivers, there's a chance for diversion
24 there. And to make sure that that supply chain is

1 intact.

2 Q Okay. So you talked about ways that
3 diversion can occur, but before we get there, what
4 do you understand the term "diversion" to mean?
5 When somebody diverts something when it comes to
6 controlled substances, what does that mean to you?

7 A Loss of controlled substance.

8 Q Loss of product?

9 A Yes.

10 Q Okay. Have you ever heard the term
11 "diversion" used to mean the use of a controlled
12 substance for an illegitimate purpose?

13 A No.

14 Q Never heard of that concept?

15 A No.

16 Q Okay. You've talked a couple of times
17 about compliance with Federal Regulations, and
18 that you're familiar with the Controlled
19 Substances Act, correct?

20 MR. COLLINS: Objection. Lacks
21 foundation, calls for a legal conclusion.

22 THE WITNESS: Is that the Code of
23 Federal Regulations?

24 BY MR. BOGLE:

1 Q I'm just asking if you're familiar with
2 the Controlled Substances Act.

3 A I'm not sure.

4 Q You're not -- have you ever heard that
5 phrase used, Controlled Substances Act?

6 A No.

7 Q Never heard that?

8 A No.

9 Q Okay. So is that -- have you ever read
10 any portion of that act in conjunction with your
11 responsibilities at McKesson?

12 A I would have to see it. I'm not sure it
13 was called the Controlled Substance Act. I just
14 know the Code of Federal Regulations.

15 Q Okay. Do you have any familiarity as to
16 whether the Controlled Substances Act was -- was
17 and is designed to prevent diversion of controlled
18 substances like opioids?

19 MR. COLLINS: Objection. Calls for a
20 legal conclusion, form.

21 THE WITNESS: I can't answer to that. I
22 don't know.

23 BY MR. BOGLE:

24 Q Are you familiar with SOP 55? Ever

1 heard of that?

2 A No.

3 Q Okay. And SOP, I'm referring to
4 Standard Operating Procedure, 55. Does that help
5 at all?

6 A I don't call it that.

7 Q Okay.

8 A I'm not familiar with that.

9 Q Okay. I'm going to hand you what I'm
10 marking as -- it's labeled as Exhibit 1.1555,
11 being marked as Snider Exhibit 1.

12 (Snider Exhibit No. 1 was marked
13 for identification.)

14 MR. BOGLE: There's yours, and there's
15 an extra there too.

16 BY MR. BOGLE:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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A horizontal bar chart with 20 rows. Each row has a small square icon on the left and a corresponding horizontal bar. The bars vary in length and position, representing percentages. The categories are not explicitly labeled, but the bars represent data points for each category.

Category	Percentage
1	85%
2	75%
3	90%
4	85%
5	80%
6	85%
7	80%
8	20%
9	65%
10	15%
11	20%
12	95%
13	95%
14	55%
15	45%
16	55%
17	85%
18	80%
19	35%
20	25%
21	95%
22	60%
23	45%
24	55%
25	50%

Category	Percentage
1	100%
2	100%
3	100%
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67	68	69
70	71	72
73	74	75
76	77	78
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88	89	90
91	92	93
94	95	96
97	98	99
100	101	102

Horizontal bar chart showing the percentage of respondents for various categories of people who have been in contact with someone who has been infected with COVID-19. The categories are: Family members, Friends, Acquaintances, Neighbors, Colleagues, Strangers, Healthcare workers, Public places, and Other. The percentages are: Family members (45%), Friends (35%), Acquaintances (25%), Neighbors (15%), Colleagues (10%), Strangers (5%), Healthcare workers (3%), Public places (2%), and Other (1%).

Category	Percentage
Family members	45%
Friends	35%
Acquaintances	25%
Neighbors	15%
Colleagues	10%
Strangers	5%
Healthcare workers	3%
Public places	2%
Other	1%

[illegible]

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Category	Percentage
1. 100%	100%
2. 100%	100%
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Category	Percentage
1. Very high	85%
2. High	80%
3. Medium	20%
4. Low	10%
5. Very low	10%
6. Not at all	10%
7. Don't know	10%
8. No answer	10%
9. No opinion	10%
10. No response	10%
11. No comment	10%
12. No information	10%
13. No data	10%
14. No results	10%
15. No findings	10%
16. No conclusions	10%
17. No recommendations	10%
18. No suggestions	10%
19. No advice	10%
20. No help	10%
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22. No assistance	10%
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25. No comfort	10%
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27. No consolation	10%
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31. No compassion	10%
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Category	Percentage
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[REDACTED]

13 BY MR. BOGLE:

14 Q Okay. So would you agree that if New
15 Castle complies with the Controlled Substances
16 Act, that goes a long way in preventing diversion
17 of opioids, right?

18 MR. COLLINS: Objection to the form,
19 vague, calls for a legal conclusion.

20 THE WITNESS: I think it helps.

21 BY MR. BOGLE:

22 Q Do you agree there is currently an
23 opioid epidemic in this country?

24 A Yes.

1 Q And do you agree that the diversion of
2 controlled substances is a cause of that epidemic?

3 MR. COLLINS: Objection. Calls for a
4 legal conclusion. Foundation.

5 THE WITNESS: You keep using the word
6 "diversion." In the control of McKesson New
7 Castle, I believe if there were diversion, that
8 would not help the opioid crisis.

9 BY MR. BOGLE:

10 Q All right. And the opioid crisis that
11 we are dealing with today, do you understand was
12 caused, in part, by diversion of controlled
13 substances?

14 MR. COLLINS: Objection. Form, calls
15 for a legal conclusion, lack of foundation.

16 THE WITNESS: I don't know that.

17 BY MR. BOGLE:

18 Q You don't know.

19 Are you aware that opioid overdoses are
20 the leading cause of injury-related death in the
21 United States?

22 MR. COLLINS: Objection. Form.

23 THE WITNESS: No, I'm not.

24 BY MR. BOGLE:

1 Q Okay. I'm going to hand you what I'm
2 marking as Exhibit 1.264, also marked as Snider
3 Exhibit 2.

4 (Snider Exhibit No. 2 was marked
5 for identification.)

6 MR. COLLINS: Thank you.

7 BY MR. BOGLE:

8 Q Do you see here, to introduce the
9 document, at the top it says "E&C, U.S. House of
10 Representatives, Committee on Energy and
11 Commerce."

12 Do you see that?

13 A Yes.

14 Q And it's dated May 4, 2018?

15 A Yes.

16 Q And do you -- below that it says:
17 "Regarding hearing entitled 'Combating the Opioid
18 Epidemic,' examining concerns about distribution
19 and diversion."

20 Do you see that?

21 A Yes.

22 Q Okay. And if you go to the second page
23 of this document, the paragraph below the chart
24 that starts with "The U.S. continues." Do you see

1 that?

2 A Yes.

3 Q It says: "The U.S. continues to
4 experience an opioid epidemic which has worsened
5 over the last two decades. Opioid-involved
6 overdose deaths are the leading cause of injury
7 death in the U.S. and take the lives of 115
8 Americans per day."

9 Do you see that?

10 A Yes.

11 Q Have you ever seen or heard of that stat
12 before?

13 MR. COLLINS: Objection. Foundation.

14 THE WITNESS: No.

15 BY MR. BOGLE:

16 Q Any reason to dispute that?

17 MR. COLLINS: Objection. Foundation,
18 form, asked and answered.

19 THE WITNESS: I couldn't say.

20 BY MR. BOGLE:

21 Q Okay. It goes on to say: "According to
22 a recent report issued by the Centers for Disease
23 Control and Prevention, prescription or illicit
24 opioids were involved in nearly two-thirds of all

1 drug overdose deaths in the U.S. during 2016, a
2 27.7 percent increase from 2015."

3 Do you see that?

4 A Yes.

5 Q And it says: "In total, more than
6 351,000 people have died since 1999 due to an
7 opioid-involved overdose. The crisis has become
8 so severe that the average life expectancy
9 declined in 2016 from the previous year largely
10 because of opioid overdoses."

11 Do you see that?

12 A Yes.

13 Q Okay. Have you ever heard that before,
14 that the life expectancy in this country has
15 declined largely because of opioid overdoses?

16 MR. COLLINS: Objection. Form,
17 foundation.

18 THE WITNESS: No.

19 BY MR. BOGLE:

20 Q That's news to you?

21 MR. COLLINS: Objection. Argumentative.

22 THE WITNESS: Yes.

[illegible]

[illegible]

[illegible]

[illegible]

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[illegible]

[illegible]

17 BY MR. BOGLE:

18 Q I'm going to hand you what I'm marking
19 as Exhibit 1.1464, also marked as Exhibit 3.

20 (Snider Exhibit No. 3 was marked
21 for identification.)

22 BY MR. BOGLE:

23 Q This is a letter from the U.S.
24 Department of Justice, Drug Enforcement

1 Administration, September 27, 2006.

2 Do you see that?

3 A Yes.

4 Q Okay. Have you ever seen this letter
5 before?

6 A No, I haven't.

7 Q You have not. Okay.

8 Communications from the DEA regarding
9 your responsibilities at New Castle, do those
10 generally not make their way to you?

11 MR. COLLINS: Objection. Assumes facts
12 not in evidence, argumentative, foundation, form.

13 THE WITNESS: Yes, they made their way
14 to us, and we would adopt -- adapt the manual and
15 follow the SOPs and new procedures.

16 BY MR. BOGLE:

17 Q Okay. But you've never seen this
18 letter?

19 A No, I'm sorry, I don't remember seeing
20 it.

21 Q Well, let me ask you about a couple of
22 things in here.

23 To start, it says: "This letter is
24 being sent to every commercial entity in the

1 United States registered with the Drug Enforcement
2 Administration to distribute controlled
3 substances. The purpose of this letter is to
4 reiterate the responsibilities of controlled
5 substance distributors in view of the prescription
6 drug abuse problem our nation currently faces."

7 Do you see that?

8 A Yes.

9 Q Okay. And then the third paragraph on
10 the first page which starts with "Distributors
11 are," do you see that sentence? It's the second
12 sentence in that paragraph.

13 MR. COLLINS: Third paragraph, the
14 second sentence.

15 THE WITNESS: Oh, okay.

16 BY MR. BOGLE:

17 Q It says: "Distributors are of course
18 one of the key components of the distribution
19 chain. If the closed system is to function
20 properly as Congress envisioned, distributors must
21 be vigilant in deciding whether a prospective
22 customer can be trusted to deliver controlled
23 substances only for lawful purposes."

24 Do you see that?

1 A Yes.

2 Q Do you agree with that statement?

3 MR. COLLINS: Objection. Form.

4 Foundation.

5 THE WITNESS: Yes.

6 BY MR. BOGLE:

7 Q It says: "This responsibility is
8 critical as Congress has expressly declared that
9 the illegal distribution of controlled substances
10 has a substantial and detrimental effect on the
11 health and general welfare of the American
12 people."

13 Do you see that?

14 A Yes.

15 Q If you go to the second page here, I'm
16 about three-quarters of the way down the page, the
17 paragraph starting with "Thus." Do you see that?

18 A Yes.

19 Q It says: "Thus, in addition to
20 reporting all suspicious orders, a distributor has
21 a statutory responsibility to exercise due
22 diligence to avoid filling suspicious orders that
23 might be diverted into other than legitimate
24 medical, scientific and industrial channels."

1 Do you see that?

2 A Yes.

3 Q Okay. But in 2006, I think we just
4 talked about the fact that when a suspicious order
5 was detected at your facility at least, it was
6 filled, right?

7 MR. COLLINS: Objection. Form,
8 foundation.

9 THE WITNESS: Not always.

10 BY MR. BOGLE:

11 Q Okay.

12 A I testified that not always. We would
13 cut orders down on occasion.

14 Q When you thought they had fat fingers.
15 I think that was the term you used.

16 A Or they -- yeah, or they made a mistake.

17 Q Right. But if you thought that they
18 were ordering what they were -- intended to order,
19 that order was filled, even though you're saying
20 that a suspicious order report would have been
21 provided to the DEA, right?

22 MR. COLLINS: Objection. Form.

23 THE WITNESS: If the definition is off
24 of that report, three times or the eight times,

1 yes.

2 BY MR. BOGLE:

3 Q Then it would have been filled, right?

4 A Yes.

5 Q Okay. And this letter from the DEA
6 indicates that you shouldn't be filling those kind
7 of prescriptions, right?

8 MR. COLLINS: Objection.

9 BY MR. BOGLE:

10 Q If you've identified them as suspicious.

11 MR. COLLINS: Objection. Foundation,
12 compound, argumentative, calls for a legal
13 conclusion.

14 THE WITNESS: I don't see it that way.

15 BY MR. BOGLE:

16 Q You don't think that's what that says?

17 A No.

18 Q Okay. And the responsibility to avoid
19 shipment of orders deemed suspicious by a
20 distributor, that policy has always been in effect
21 since the Controlled Substances Act was enacted in
22 1970, right?

23 MR. COLLINS: Objection. Form, assumes
24 multiple facts, legal conclusion.

1 THE WITNESS: I can't say that. 1970,
2 I -- I don't know that.

3 BY MR. BOGLE:

4 Q Well, do you think this -- this sentence
5 I read to you here about avoiding filling
6 suspicious orders was something new that was added
7 to the regulations in '06?

8 MR. COLLINS: Objection. Calls for a
9 hypothetical, speculation.

10 THE WITNESS: I don't know.

11 MR. COLLINS: Calls for a legal
12 conclusion.

13 BY MR. BOGLE:

14 Q You don't know?

15 A No.

16 Q And the next paragraph down, the last
17 sentence says: "Again, to maintain effective
18 controls against diversion, as Section 823(e)
19 requires, the distributor should exercise due care
20 in confirming the legitimacy of all orders prior
21 to filling." Right?

22 A Yes.

23 Q Okay. And you know that's not a new
24 policy either, right?

1 MR. COLLINS: Objection.

2 BY MR. BOGLE:

3 Q In '06.

4 MR. COLLINS: Objection. Vague, calls
5 for a legal conclusion.

6 THE WITNESS: I don't know that.

7 BY MR. BOGLE:

8 Q Okay. Do you have any disagreement that
9 that's what the law required in '06?

10 MR. COLLINS: Objection. Calls for
11 speculation, legal conclusion, asked and answered.

12 THE WITNESS: I have no disagreement
13 with that it's -- that it's written there.

14 BY MR. BOGLE:

15 Q Okay. And would you agree with the
16 notion that reporting a suspicious order to the
17 DEA and not filling it gives the DEA the
18 opportunity to investigate that order without
19 having the potential of getting into the public
20 for potential diversion?

21 MR. COLLINS: Objection, if that's a
22 question. Calls for a legal conclusion, it's
23 compound, it's vague.

24 BY MR. BOGLE:

1 Q You can answer.

2 MR. COLLINS: And it calls for
3 speculation.

4 THE WITNESS: I can't answer to that. I
5 don't know.

6 BY MR. BOGLE:

7 Q Okay. Do you think the DEA has the same
8 ability to investigate and prevent diversion after
9 you've filled the order versus if you hadn't
10 filled it at all?

11 MR. COLLINS: Objection. Foundation,
12 argumentative, compound.

13 THE WITNESS: I know in New Castle, we
14 had a relationship with the DEA, and I talked to
15 them, they called me. At one point the DEA agent
16 in charge was my neighbor, so I knew them, and I
17 knew if there was a problem, they would let me
18 know.

19 MR. BOGLE: Move to strike as
20 nonresponsive.

21 BY MR. BOGLE:

22 Q My -- my question simply was, if you
23 fill an order that you deem suspicious, then it
24 naturally is going to be harder to the DEA to

1 prevent diversion from that suspicious order as
2 opposed to if you had reported it and not filled
3 it at all, right?

4 MR. COLLINS: Objection. Closing
5 argument. Assumes facts not in evidence, calls
6 for speculation, form, compound, vague.

7 THE WITNESS: I don't know that.

8 BY MR. BOGLE:

9 Q You don't know.

10 A No.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[illegible]

■ [REDACTED]
2 BY MR. BOGLE:

3 Q Okay.

4 MR. COLLINS: Are you moving on to
5 something else?

6 MR. BOGLE: Yeah.

7 MR. COLLINS: Can we take a short break?
8 We've been going 70 minutes.

9 MR. BOGLE: That's fine.

10 THE VIDEOGRAPHER: The time is 9:42 a.m.
11 We're going off the record.

12 (Recess.)

13 THE VIDEOGRAPHER: The time is 9:55 a.m.
14 We're back on the record.

■ [REDACTED]
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[illegible]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED] ■ [REDACTED]

■ [REDACTED] [REDACTED]

5 THE WITNESS: According to Diane.

6 BY MR. BOGLE:

7 Q It -- and that's actually according to
8 Alexandra, right?

9 A Or Alex -- Alexandra, yes.

10 Q Okay. What did she do at McKesson at
11 that point in time? What was her job?

12 A Sales.

13 Q Okay. When Alexandra said something,
14 was it generally accurate?

15 MR. COLLINS: Objection. Calls for
16 speculation.

17 BY MR. BOGLE:

18 Q Did you find her to be inaccurate
19 frequently in her e-mails?

20 MR. COLLINS: Objection. Speculation.

21 THE WITNESS: I can't -- I can't respond
22 to her accuracy on e-mails.

23 BY MR. BOGLE:

■ [REDACTED] ■ [REDACTED]

[illegible]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

15 Q Okay. When you got this e-mail in
16 December 2007, did you write back and say, What is
17 this chart? I don't know what this means?

18 MR. COLLINS: Objection. Calls for
19 speculation, foundation.

20 THE WITNESS: I don't know from 2007.

21 BY MR. BOGLE:

22 Q Okay. Well, I can tell you I looked,
23 and I didn't see any e-mail from you that said, I
24 don't understand what this chart means, guys. Can

[illegible]

[illegible]

[illegible]

Highly Confidential - Subject to Further Confidentiality Review

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1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83																	

The image shows a horizontal bar chart with 25 rows. Each row begins with a small gray square. Following this square is a gap, and then one or more gray bars of varying lengths and positions. The bars are distributed across the width of the chart area, with some rows having multiple bars. The bars are gray and the background is white.

1		100	100
2		100	100
3		100	100
4		100	100
5		100	100
6	100	100	100
7		100	100
8	100	100	100
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16	100	100	100
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26	100	100	100
27	100	100	100
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29	100	100	100
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31	100	100	100
32	100	100	100
33	100	100	100
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35	100	100	100
36	100	100	100
37	100	100	100
38	100	100	100
39	100	100	100
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41	100	100	100
42	100	100	100
43	100	100	100
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87	100	100	100
88	100	100	100
89	100	100	100
90	100	100	100
91	100	100	100
92	100	100	100
93	100	100	100
94	100	100	100
95	100	100	100
96	100	100	100
97	100	100	100
98	100	100	100
99			

1 BY MR. BOGLE:

2 Q Let me ask you this: If you had
3 concerns about controlled substances going, and
4 specifically opioids, going to a New Castle
5 customer from 2000 to 2018, it was, first of all,
6 your responsibility to raise that concern, right?

7 MR. COLLINS: Objection. Compound.
8 Assumes facts not in evidence.

9 THE WITNESS: Yes.

10 BY MR. BOGLE:

11 Q Okay. You knew that was your job,
12 right?

13 A Yes.

14 Q Okay. And ultimately, if you raised
15 that concern, you were in a position of management
16 at the DC when you did so, right?

17 A Yes.

18 Q Okay. You're somebody that people
19 listen to, right?

20 A I can't answer that. I don't know.

21 Q You don't know if people listen to you?

22 A I'm sure they do. Some do, some don't.

23 Q Okay. As to Franklin's Pharmacy, for

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

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[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

23 Q Okay. Let's go back to Exhibit 1.1830,
24 I think it's Exhibit 4 to the deposition. We were

1 talking about this --

2 MR. COLLINS: I'm sorry, hold on a
3 second.

4 MR. BOGLE: Yeah, it's the PowerPoint
5 deck you have right next to you, the Lifestyle
6 Drug.

7 BY MR. BOGLE:

8 Q We were talking about this a few moments
9 ago. I want to go to page .7 in this slide deck.

10 It's noted here, the slide is titled

Age Group	Percentage
18-24	10%
25-34	15%
35-44	20%
45-54	25%
55-64	30%
65-74	35%
75-84	40%
85+	45%

Age Group	Percentage
18-24	10%
25-34	15%
35-44	20%
45-54	25%
55-64	30%
65-74	35%
75-84	40%
85+	45%

[illegible]

[illegible]

[illegible]

1	1	1	1
2	2	2	2
3	3	3	3
4	4	4	4
5	5	5	5
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93	93	93	93
94	94	94	94
95	95	95	95
96	96	96	96
97	97	97	97
98	98	98	98
99	99	99	99
100	100	100	100

[illegible]

A horizontal bar chart with 20 rows. Each row has a small square marker on the left, followed by a label, and then a horizontal bar representing a percentage. The bars are gray. The labels are as follows:

- Row 1: [] [] []
- Row 2: [] [] []
- Row 3: [] [] []
- Row 4: [] [] []
- Row 5: [] [] []
- Row 6: [] [] []
- Row 7: [] [] []
- Row 8: [] [] []
- Row 9: [] [] []
- Row 10: [] [] []
- Row 11: [] [] []
- Row 12: [] [] []
- Row 13: [] [] []
- Row 14: [] [] []
- Row 15: [] [] []
- Row 16: [] [] []
- Row 17: [] [] []
- Row 18: [] [] []
- Row 19: [] [] []
- Row 20: [] [] []

The bars represent the following approximate percentages:

Category	Percentage
[] [] []	75%
[] [] []	88%
[] [] []	85%
[] [] []	20%
[] [] []	70%
[] [] []	78%
[] [] []	88%
[] [] []	10%
[] [] []	85%
[] [] []	92%
[] [] []	75%
[] [] []	88%
[] [] []	30%
[] [] []	45%
[] [] []	92%
[] [] []	85%
[] [] []	88%
[] [] []	15%
[] [] []	80%
[] [] []	88%
[] [] []	78%
[] [] []	50%
[] [] []	75%
[] [] []	75%
[] [] []	75%

Category	Percentage
U.S. should take action	65%
U.S. should not take action	35%

1	2	3	4
5	6	7	8
9	10	11	12
13	14	15	16
17	18	19	20
21	22	23	24
25	26	27	28
29	30	31	32
33	34	35	36
37	38	39	40
41	42	43	44
45	46	47	48
49	50	51	52
53	54	55	56
57	58	59	60
61	62	63	64
65	66	67	68
69	70	71	72
73	74	75	76
77	78	79	80
81	82	83	84
85	86	87	88
89	90	91	92
93	94	95	96
97	98	99	100

[illegible]

Category	Percentage
1. Very high	100%
2. High	100%
3. Medium	100%
4. Low	100%
5. Very low	100%
6. Not at all	100%
7. Don't know	100%
8. No answer	100%
9. No opinion	100%
10. No response	100%
11. No data	100%
12. No information	100%
13. No access	100%
14. No contact	100%
15. No communication	100%
16. No interaction	100%
17. No participation	100%
18. No involvement	100%
19. No engagement	100%
20. No contribution	100%
21. No input	100%
22. No output	100%
23. No result	100%
24. No achievement	100%
25. No success	100%
26. No failure	100%
27. No loss	100%
28. No gain	100%
29. No benefit	100%
30. No harm	100%
31. No risk	100%
32. No danger	100%
33. No threat	100%
34. No danger	100%
35. No risk	100%
36. No harm	100%
37. No benefit	100%
38. No gain	100%
39. No loss	100%
40. No failure	100%
41. No success	100%
42. No achievement	100%
43. No result	100%
44. No output	100%
45. No input	100%
46. No contribution	100%
47. No engagement	100%
48. No involvement	100%
49. No participation	100%
50. No interaction	100%
51. No communication	100%
52. No contact	100%
53. No access	100%
54. No information	100%
55. No data	100%
56. No response	100%
57. No opinion	100%
58. No answer	100%
59. Don't know	100%
60. Not at all	100%
61. Very low	100%
62. Low	100%
63. Medium	100%
64. High	100%
65. Very high	100%

1	2	3	4
5	6	7	8
9	10	11	12
13	14	15	16
17	18	19	20
21	22	23	24
25	26	27	28
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49	50	51	52
53	54	55	56
57	58	59	60
61	62	63	64
65	66	67	68
69	70	71	72
73	74	75	76
77	78	79	80
81	82	83	84
85	86	87	88
89	90	91	92
93	94	95	96
97	98	99	100

A horizontal bar chart with 20 rows. Each row has a small square icon on the left and a gray bar representing a percentage. The bars vary in length and position, with some starting at the left margin and others being indented. The longest bar is in the 9th row, extending nearly to the right margin. The shortest bar is in the 14th row, starting with an indentation and extending about one-third of the way across the chart area.

Row	Percentage (%)
1	85
2	90
3	55
4	95
5	90
6	90
7	75
8	98
9	95
10	90
11	90
12	90
13	90
14	35
15	90
16	90
17	90
18	90
19	90
20	90

[illegible]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8 Q Sure. I'm just talking about 1.1 right
9 now.

10 A (Peruses document.)

11 Okay. What was your question?

12 Q Yeah. I'm just kind of orienting you at
13 this point. You said you wanted to look at it, so
14 I didn't really have one. I was trying to orient
15 you to where we were at.

16 A Okay.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83																	

[illegible]

[illegible]

[illegible]

[illegible]

[REDACTED]

19 BY MR. BOGLE:

20 Q I'm going to hand you what I'm marking
21 as Exhibit 1.1679, also Exhibit 7.

22 (Snider Exhibit No. 7 was marked
23 for identification.)

24 BY MR. BOGLE:

1 Q Are you familiar with Dave Gustin?

2 A Yes.

3 Q Okay. He was in the regulatory
4 department at McKesson, right?

5 A Yes.

6 Q Okay. I want to take a look at page .2
7 here, the second page.

8 MR. COLLINS: I'm sorry. If you need to
9 take more time to review it to familiarize
10 yourself with the document, please do.

11 BY MR. BOGLE:

100% 100% 100%



Age Group	Percentage
18-24	10%
25-34	15%
35-44	20%
45-54	25%
55-64	30%
65-74	35%
75-84	40%
85+	45%

[illegible]

[illegible]

[illegible]

█ [REDACTED]

2 BY MR. BOGLE:

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED] [REDACTED] [REDACTED]

█ [REDACTED] [REDACTED] [REDACTED]

█ [REDACTED]

█ [REDACTED]

20 BY MR. BOGLE:

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

[illegible]

[illegible]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

13 BY MR. BOGLE:

14 Q Have they ever shown this document to
15 you?

16 A I don't remember seeing this.

17 Q McKesson? Anybody? So nobody has ever
18 talked to you about what the regional norms are
19 for your -- the region that your distribution
20 center covers --

21 MR. COLLINS: Objection --

22 BY MR. BOGLE:

23 Q -- for these controlled substances?

24 MR. COLLINS: Objection. The question

1 is compound and argumentative.

2 THE WITNESS: No, I've never seen the
3 Northeast for all these DCs: Boston, New Castle,
4 Rockhill, Buffalo.

5 BY MR. BOGLE:

6 Q Okay. You see this is an internal
7 McKesson document, right?

8 MR. COLLINS: Objection. Lack of
9 foundation.

10 BY MR. BOGLE:

11 Q It says "McKesson" on it.

12 A I don't -- I don't have any knowledge.

13 Q It's got a Bates stamp produced from
14 defense counsel for McKesson, coming from
15 McKesson's files. Do you see that?

16 MR. COLLINS: Objection. If you're
17 testifying to that, that's fine. He doesn't have
18 any knowledge of that.

19 BY MR. BOGLE:

20 Q Do you see that?

21 A I'm sorry. Can you --

22 Q First of all, McKesson, you see that?

23 MR. BOGLE: Can we highlight that?

24 THE WITNESS: I think I'll testify that

1 I've never seen this document before.

2 BY MR. BOGLE:

3 Q Yeah, I'm just asking.

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

14 MR. COLLINS: Objection to the word

15 "regionally."

16 BY MR. BOGLE:

17 Q When you're out there conducting reviews

18 of customers, your due diligence component of --

19 of your job, you would agree with me that

20 assessing whether the customer has significant

21 business coming from pain clinics is relevant in

22 assessing whether to increase an opioid threshold,

23 right?

24 MR. COLLINS: Objection. Form,

1 foundation.

2 THE WITNESS: I would assess all aspects
3 of the customer.

4 BY MR. BOGLE:

5 Q Right. And specifically, whether they
6 do substantial business with pain clinics is
7 relevant to consider whether to increase an opioid
8 threshold, right?

9 A I'm not sure.

[REDACTED]

[REDACTED]

[REDACTED]

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■ [REDACTED]

■ [REDACTED] [REDACTED]

■ [REDACTED] [REDACTED]

■ [REDACTED] [REDACTED]

5 Q I'm asking you a question. Okay. Just
6 listen to my question.

7 A Okay.

8 Q When McKesson DC management or
9 regulatory staff -- so DC management, that's you,
10 right?

11 MR. COLLINS: Objection. You haven't
12 established this witness has any firsthand
13 knowledge of this document.

14 MR. BOGLE: That's the whole purpose is
15 that if he doesn't, that's a big problem.

16 MR. COLLINS: The witness has already
17 testified, and you're testifying as to what the
18 contents are. Typically it goes question and
19 answer where you elicit information from a
20 witness.

21 MR. BOGLE: You're -- you're -- you're
22 not even objecting. You're just talking.

23 MR. COLLINS: No, no, because you're
24 ignoring the objection. The witness has no

Category	Percentage
1. Very high	10%
2. High	25%
3. Medium	15%
4. Low	10%
5. Very low	10%
6. Not at all	10%
7. Don't know	10%
8. No answer	10%
9. No opinion	10%
10. No response	10%
11. No data	10%
12. No information	10%
13. No access	10%
14. No contact	10%
15. No communication	10%
16. No interaction	10%
17. No participation	10%
18. No involvement	10%
19. No engagement	10%
20. No contribution	10%
21. No input	10%
22. No output	10%
23. No result	10%
24. No achievement	10%
25. No success	10%
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27. No loss	10%
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30. No harm	10%
31. No risk	10%
32. No danger	10%
33. No threat	10%
34. No danger	10%
35. No risk	10%
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37. No benefit	10%
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39. No loss	10%
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56. No response	10%
57. No opinion	10%
58. No answer	10%
59. Don't know	10%
60. Not at all	10%
61. Very low	10%
62. Low	10%
63. Medium	10%
64. High	10%
65. Very high	10%

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1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83																	

Category	Percentage
1. Very high	95%
2. High	85%
3. Medium	35%
4. Low	15%
5. Very low	15%
6. Not sure	10%
7. Don't know	10%
8. No answer	10%
9. No opinion	10%
10. No response	10%
11. No data	10%
12. No information	10%
13. No knowledge	10%
14. No experience	10%
15. No contact	10%
16. No relationship	10%
17. No connection	10%
18. No link	10%
19. No association	10%
20. No correlation	10%
21. No comparison	10%
22. No contrast	10%
23. No difference	10%
24. No similarity	10%
25. No contrast	10%
26. No difference	10%
27. No similarity	10%
28. No contrast	10%
29. No difference	10%
30. No similarity	10%

The image displays a horizontal bar chart consisting of 25 rows. Each row begins with a small, dark gray square icon. To the right of each icon is a horizontal gray bar. The bars vary in their starting and ending horizontal positions relative to the chart's boundaries. Some bars start at the far left, while others are indented. The lengths of the bars also vary, with some extending nearly across the entire width of the chart and others being much shorter. The overall pattern of bars is irregular and non-repeating.

[illegible]

[illegible]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

6 BY MR. BOGLE:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

13 MR. BOGLE: Yeah. Let me look real
14 quick. I think -- yeah. We can take a break now
15 is good.

16 MR. COLLINS: Yep.

17 THE VIDEOGRAPHER: The time is
18 11:14 a.m. We're going off the record.

19 (Recess.)

20 THE VIDEOGRAPHER: The time is 11:29
21 a.m., and we're back on the record.

22 BY MR. BOGLE:

23 Q All right. Mr. Snider, the -- your New
24 Castle Distribution Center is in -- located in

1 Pennsylvania, right?

2 A Yes.

3 Q Okay. But you guys service customers
4 outside of the state of Pennsylvania, correct?

5 A Yeah -- oh, yes.

6 Q For example, you service customers in
7 Ohio, right?

8 A Yes.

9 Q You service customers in West Virginia,
10 right?

11 A Yes.

12 Q Okay. And we talked a little bit about
13 the opioid epidemic earlier in your deposition,
14 but you understand that West Virginia is one of
15 the states that's been hit hardest by the opioid
16 epidemic, right?

17 A Yes.

18 Q And In fact, there have been
19 congressional investigations into McKesson's
20 conduct specific to pharmacies supplied in West
21 Virginia.

22 Do you understand that?

23 MR. COLLINS: Objection. Form.

24 THE WITNESS: I don't know that. I'm

1 sorry.

2 BY MR. BOGLE:

3 Q Okay. You've never been told that?

4 A No.

5 Q Okay.

6 (Snider Exhibit No. 12 was marked
7 for identification.)

8 BY MR. BOGLE:

9 Q I'm going to hand you 1.44, Exhibit 12
10 to your deposition.

11 Okay. This is noted at the top to be
12 from the House of Representatives, Congress of the
13 United States, February 15, 2008. Do you see
14 that?

15 A Yes.

16 Q Okay. And it's a letter sent to
17 Mr. John Hammergren. That's the CEO of McKesson,
18 right?

19 MR. COLLINS: Objection. Lack of
20 foundation.

21 THE WITNESS: Yes.

22 BY MR. BOGLE:

23 Q Do you see where it's -- he's noted to
24 be the recipient, "Dear Mr. Hammergren"?

1 A I would think he got it.

2 MR. COLLINS: Objection.

3 BY MR. BOGLE:

4 Q Do you see that this was designed to be
5 sent to him, right?

6 MR. COLLINS: Objection. The witness
7 has no firsthand knowledge.

8 THE WITNESS: I don't know anything
9 about this document, so I can't answer to that.

10 BY MR. BOGLE:

11 Q All right. But you see it says, "Dear
12 Mr. Hammergren," right? Do you see that on the
13 first page?

14 A Yeah, I see that.

15 Q You see that?

16 A Yeah.

17 Q Okay. And so if you look at the first
18 page of this document, it says in the second
19 paragraph, "As part of our investigation." Do you
20 see that?

21 A Yes.

22 Q It says: "As part of our investigation,
23 the Committee wrote to you on May 8, 2017,
24 regarding your distribution practices generally,

1 and in particular with respect to West Virginia.

2 As we mentioned in the letter, the opioid epidemic
3 has been particularly devastating to West
4 Virginia. For example, in 2015, West Virginia had
5 the highest opioid overdose death rate in the
6 nation."

7 And then it goes on, the last sentence
8 in that paragraph says: "Court filings also
9 indicate that between 2007 and 2012, McKesson
10 distributed 46,179,600 doses of hydrocodone and
11 54,304,980 doses of oxycodone, meaning that
12 McKesson shipped a total of 100,484,580 doses to
13 West Virginia during this time period."

14 Have you ever seen that kind of data
15 talking about the number of hydrocodone and
16 oxycodone pills McKesson distributed to West
17 Virginia during this time frame?

18 A No, I haven't.

19 Q Okay. You know that a fair amount of
20 those pills that are being referenced here came
21 from your distribution center, right?

22 MR. COLLINS: Objection. Lack of
23 foundation. Lack of firsthand knowledge.

24 THE WITNESS: I don't know that.

1 BY MR. BOGLE:

2 Q Okay. Well, you know from 2007 to 2012
3 that -- that the New Castle Distribution Center
4 was sending hydrocodone and oxycodone to
5 pharmacies in West Virginia, right?

6 A Yes.

7 Q Okay. So, therefore, you must present
8 some of this number coming from New Castle, right?

9 MR. COLLINS: Objection. The question
10 is vague.

11 THE WITNESS: If I could answer that,
12 the DEA has done audits on us. We've never been
13 found to do anything wrong. New Castle has an
14 exemplary record.

15 MR. BOGLE: Move to strike as
16 nonresponsive.

17 BY MR. BOGLE:

18 Q My question simply was, of these 100
19 million plus doses referenced here, you know that
20 a portion of those came from your distribution
21 center --

22 MR. COLLINS: Objection.

23 BY MR. BOGLE:

24 Q -- during this time frame, correct?

1 MR. COLLINS: The question was asked and
2 answered last -- a moment ago.

3 BY MR. BOGLE:

4 Q Correct?

5 MR. COLLINS: Same -- same objection.
6 Asked and answered.

7 THE WITNESS: A -- a portion probably
8 did.

9 BY MR. BOGLE:

10 Q Well, you know they did, right? From
11 2007 to 2012, you know that the New Castle
12 Distribution Center was servicing West Virginia
13 pharmacies, right? So it has to be part of this
14 number, true?

15 MR. COLLINS: Objection.

16 BY MR. BOGLE:

17 Q You know that.

18 MR. COLLINS: Objection. The question
19 is compound three different ways. It's
20 argumentative. It's been asked and answered.

21 BY MR. BOGLE:

22 Q You know that, don't you?

23 MR. COLLINS: Objection. Form.

24 THE WITNESS: I've never seen this

Category	All respondents (%)	Non-respondents (%)	Respondents (%)
Total	100	100	100
Male	50	50	50
Female	50	50	50
Age 18-24	15	15	15
Age 25-34	25	25	25
Age 35-44	20	20	20
Age 45-54	15	15	15
Age 55-64	10	10	10
Age 65+	15	15	15
Education: High school or less	30	30	30
Education: Some college	25	25	25
Education: Bachelor's degree or higher	45	45	45
Income: Less than \$10,000	10	10	10
Income: \$10,000-\$24,999	20	20	20
Income: \$25,000-\$49,999	30	30	30
Income: \$50,000-\$74,999	20	20	20
Income: \$75,000-\$99,999	10	10	10
Income: \$100,000 or more	10	10	10
Married	50	50	50
Single	30	30	30
Divorced	10	10	10
Widowed	10	10	10
Never married	10	10	10
Married with children	30	30	30
Married without children	20	20	20
Single with children	10	10	10
Single without children	20	20	20
Divorced with children	5	5	5
Divorced without children	5	5	5
Widowed with children	5	5	5
Widowed without children	5	5	5
Never married with children	5	5	5
Never married without children	5	5	5
Married with children under 18	15	15	15
Married with children 18-24	10	10	10
Married with children 25-34	10	10	10
Married with children 35-44	10	10	10
Married with children 45-54	10	10	10
Married with children 55-64	10	10	10
Married with children 65+	10	10	10
Married without children	15	15	15
Single with children	5	5	5
Single without children	15	15	15
Divorced with children	5	5	5
Divorced without children	5	5	5
Widowed with children	5	5	5
Widowed without children	5	5	5
Never married with children	5	5	5
Never married without children	5	5	5

1 litigation, though, didn't you?

2 A Yes.

3 Q Okay. All right. I'm going to hand
4 you -- marking as Exhibit 13, also Exhibit 1.1824.

5 (Snider Exhibit No. 13 was marked
6 for identification.)

7 BY MR. BOGLE:

8 Q Okay. And you see this is a document;
9 the first page entitled "Mace's Pharmacy"; do you
10 see that?

11 A Yes.

12 Q Okay. Thereafter, this is all provided
13 to us as one document.

14 Does this look like your file from
15 Mace's Pharmacy for 2008 to 2010?

16 MR. COLLINS: Objection.

17 THE WITNESS: I don't know all of it.

18 BY MR. BOGLE:

19 Q You don't -- excuse me?

20 A I don't know all of it. I haven't seen
21 it yet.

22 Q Okay. Let's take a look at it.

23 A I'd have to go through them.

24 Q Okay. Let's take a look at it. First

[illegible]

[illegible]

22 Q Okay. And who is -- who is Jim

23 Gavatorra? What did he do?

24 A He was the executive salesperson.

1 Q Okay. And Brian Ferreira, I think you
2 said was vice president/general manager?

3 A Yes.

4 Q What sort of oversight did Brian
5 Ferreira provide for you?

6 A He was in charge of the distribution
7 center over all the operations, my boss, and Jim
8 reported to him directly.

9 Q Reported to him, you said?

10 A Yeah.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

7 MR. COLLINS: Objection. Lack of
8 foundation.

9 BY MR. BOGLE:

10 Q To investigate your concerns here.

11 MR. COLLINS: Objection. Lack of
12 foundation.

13 THE WITNESS: I'm sorry, I'd have to
14 look through it.

15 BY MR. BOGLE:

16 Q Okay.

17 A You want me to do that?

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Highly Confidential - Subject to Further Confidentiality Review

■	[REDACTED]	[REDACTED]
■	[REDACTED]	[REDACTED]
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■		[REDACTED]
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■		[REDACTED]

Highly Confidential - Subject to Further Confidentiality Review

[REDACTED]

1 Q Is that something you guys would look at
2 back in 2008 when evaluating a request like this?

3 A I can't --

4 MR. COLLINS: Object -- objection to the
5 term we -- "you would look at."

6 BY MR. BOGLE:

7 Q Would you?

8 A No, I don't know.

9 Q Okay.

10 A I can't speculate on that.

11 Q Okay. So if, for example, the city of
12 Philippi, West Virginia, had fewer than 3,000
13 people in it around this time frame, would that
14 raise concerns to you about how much hydrocodone
15 you're giving this company -- this pharmacy?

16 MR. COLLINS: Objection. Assumes facts
17 not in evidence, lack of foundation.

18 MR. BOGLE: Let's put it into evidence.
19 Exhibit 14, 1.1892.

20 (Snider Exhibit No. 14 was marked
21 for identification.)

22 BY MR. BOGLE:

23 Q Here is the Census Bureau data for
24 Philippi, West Virginia, from 2010. Do you see

1 there's a total population there noted to be 2,966
2 people in 2010?

3 MR. COLLINS: Objection. Lack of
4 foundation. You haven't established this witness
5 has any knowledge of this.

6 MR. BOGLE: I think that's the problem.

7 BY MR. BOGLE:

8 Q Do you not -- did you not know that?

9 A I did not --

10 MR. COLLINS: Object --

11 THE WITNESS: Sorry.

12 MR. COLLINS: I'm sorry. Please let me
13 object.

14 Argumentative. Object to the theatrics.

15 THE WITNESS: I did not know there were
16 2,966 people in the Philippi -- is that the whole
17 area or is that just the town?

18 BY MR. BOGLE:

19 Q It's the city.

20 A Okay.

21 Q You didn't know that.

22 A No.

■

■

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■

■

[illegible]

[illegible]

A horizontal bar chart with 25 rows. Each row consists of a small square marker on the left and a horizontal bar of varying length extending to the right. The bars are gray and set against a light gray background. The lengths of the bars vary significantly, representing different percentages for each category. The bars are arranged in a descending order of length from top to bottom, with the longest bar in the third row and the shortest in the fourth row.

Category	Percentage
1	85%
2	75%
3	95%
4	25%
5	70%
6	15%
7	80%
8	90%
9	55%
10	20%
11	50%
12	65%
13	85%
14	10%
15	70%
16	25%
17	60%
18	95%
19	85%
20	75%
21	90%
22	80%
23	65%
24	95%
25	85%

[illegible]

[illegible]

A 15x3 grid of gray squares of varying sizes, arranged in a pattern that suggests a stylized letter 'A' or a similar abstract shape. The squares are distributed across the grid, with some rows having more squares than others, creating a sparse, pixelated appearance.

20 Q Yeah.

21 MR. BOGLE: Let's go off the record.

22 You can go through it.

23 MR. COLLINS: No, no, we're going to
24 stay on the record.

1 MR. BOGLE: We don't need to stay on the
2 record. If he wants time to look at it, he can,
3 but don't stay on the record. There's no such
4 requirement.

5 MR. COLLINS: Well, listen, to go off
6 the record, you need an agreement. So if you want
7 to have him start leafing through documents, we're
8 staying on the record.

9 MR. BOGLE: Okay. That's fine. We'll
10 do that.

11 BY MR. BOGLE:

12 Q You can't point me to anything that
13 shows that you requested any prescription data,
14 can you?

15 MR. COLLINS: He just asked to go
16 through documents. You want him to go through
17 documents --

18 MR. BOGLE: He's not going to blow
19 through hours of my time looking at something that
20 he should already be familiar with.

21 MR. COLLINS: Well, no, he -- this isn't
22 a 30(b)(6) deposition.

23 MR. BOGLE: Doesn't have to be.

24 MR. COLLINS: This is in his personal

1 capacity. So, listen, if you want him to look
2 through documents, he will do it for you, but it's
3 on your time.

4 Take as much time as you want.

5 THE WITNESS: (Peruses document.)

6 BY MR. BOGLE:

7 Q We're in December 2009.

8 A (Peruses document.)

9 On the questionnaire on page .13, Dale
10 reviewed the scripts.

11 Q .13?

12 A Yes.

13 Q So that's from June 2007, right?

14 A Yes.

15 Q Okay. We're talking about December
16 2009.

17 A Oh.

18 Q And a specific increase that they're
19 saying -- in request in December 2009.

20 A (Peruses document.)

21 Q All right. I've got too many documents
22 to go through. I'll strike the question and keep
23 going.

24 Let's look at page .84.

[illegible]

A horizontal bar chart titled 'Percentage of respondents who believe that the government should take action to address climate change'. The chart is broken down by age group (18-29, 30-49, 50-69, 70+) and gender (Male, Female). The x-axis represents the percentage of respondents, ranging from 0% to 100%. The y-axis lists the demographic groups. The data is as follows:

Age Group	Gender	Percentage
18-29	Male	85%
	Female	90%
30-49	Male	75%
	Female	80%
50-69	Male	65%
	Female	70%
70+	Male	55%
	Female	60%

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[illegible]

[illegible]

20 Q Okay. But you do know the CSMP requires
21 that, right, documentation?

22 A Not on my file, no.

23 Q That's not my question, sir.

24 The CSMP requires documentation

1 supporting any change made to a threshold based on
2 business growth, right?

3 MR. COLLINS: Objection. Assumes facts
4 not in evidence.

5 BY MR. BOGLE:

6 Q We just looked at this a few minutes
7 ago.

8 MR. COLLINS: Objection. Show it to him
9 again.

10 BY MR. BOGLE:

11 Q You don't recall that?

12 A I'm sorry. I don't -- you'll have to
13 repeat the question.

14 Q My question was, to support a threshold
15 change based on business growth, supporting
16 documentation is required under the CSMP, right?

17 MR. COLLINS: Objection. Assumes --

18 BY MR. BOGLE:

19 Q As of 10/2010?

20 MR. COLLINS: Objection. Assumes facts
21 not in evidence.

22 THE WITNESS: I don't know that that
23 wasn't provided.

24 BY MR. BOGLE:

1 Q Not my question, sir. That was
2 required, wasn't it?

3 MR. COLLINS: Objection. Form.

4 BY MR. BOGLE:

5 Q Yes or no?

6 MR. COLLINS: Objection.

7 BY MR. BOGLE:

8 Q Or you don't know?

9 MR. COLLINS: Objection to form.

10 THE WITNESS: I don't know.

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Response	Percentage
Yes, the U.S. should take action to reduce greenhouse gas emissions	85%
No, the U.S. should not take action to reduce greenhouse gas emissions	15%

Response	Percentage
Yes, the U.S. should take action to reduce greenhouse gas emissions	95%
No, the U.S. should not take action to reduce greenhouse gas emissions	5%

☐ ☐

22 Q Okay. So in the McKesson files that
23 have been produced to us pertaining to this
24 increase, we should find some supporting

1 documentation if the CSMP was followed, right?

2 I'm not saying in your files or whose files. It
3 should be in somebody's files.

4 A I don't know that.

5 Q You don't know.

6 A I can't testify to what's in their
7 files.

8 Q I didn't ask -- I didn't say "is it." I
9 said "should it be."

10 A I can't --

11 MR. COLLINS: Objection. Calls for a
12 legal conclusion.

13 THE WITNESS: I can't testify. It was
14 electronic.

15 BY MR. BOGLE:

16 Q Okay. Was there a policy at McKesson in
17 2010 to destroy evidence of due diligence review?

18 MR. COLLINS: Objection. Argumentative.
19 Object to the theatrics.

20 BY MR. BOGLE:

21 Q There's a question.

22 A Can you repeat the question?

23 Q Was there a policy written or unwritten
24 at McKesson in October 2010 to destroy evidence of

[illegible]

Category	Percentage
1. Very high	95%
2. High	85%
3. Medium	55%
4. Low	88%
5. Very low	45%
6. Not at all	50%
7. Don't know	10%
8. No answer	10%
9. No opinion	90%
10. No response	95%
11. No data	55%
12. No information	80%
13. No access	25%
14. No contact	10%
15. No communication	80%
16. No interaction	55%
17. No participation	10%
18. No involvement	80%
19. No engagement	55%
20. No contribution	10%
21. No input	80%
22. No output	55%
23. No result	10%
24. No achievement	80%
25. No success	55%
26. No failure	10%
27. No loss	80%
28. No gain	55%
29. No benefit	10%
30. No harm	80%
31. No risk	55%
32. No danger	10%
33. No threat	80%
34. No danger	55%
35. No risk	10%
36. No harm	80%
37. No benefit	55%
38. No gain	10%
39. No loss	80%
40. No failure	55%
41. No success	10%
42. No achievement	80%
43. No result	55%
44. No output	10%
45. No input	80%
46. No contribution	55%
47. No engagement	10%
48. No involvement	80%
49. No participation	55%
50. No interaction	10%
51. No communication	80%
52. No contact	55%
53. No access	10%
54. No information	80%
55. No data	55%
56. No response	10%
57. No opinion	80%
58. No answer	55%
59. Don't know	10%
60. Not at all	80%
61. Very low	55%
62. Low	10%
63. Medium	80%
64. High	55%
65. Very high	10%

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[illegible]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

17 MR. COLLINS: Objection. We've been

18 over this --

19 BY MR. BOGLE:

20 Q Right?

21 MR. COLLINS: -- a dozen times.

22 Objection. Mischaracterization.

23 BY MR. BOGLE:

24 Q Right?

[illegible]

[illegible]

[illegible]

22 (Snider Exhibit No. 16 was marked
23 for identification.)

24 BY MR. BOGLE:

1 Q Okay. I'm going to hand you what is
2 marked as 1.1812, Exhibit 16.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

16 Q Okay. Do you know about how many people
17 lift in Weston, West Virginia?

18 A A lot more than Philippi.

19 Q Think so?

20 A Yes.

21 Q Okay. Would it surprise you that it's
22 fewer than 5,000 people?

23 A In that area?

24 Q In Weston, West Virginia.

1 A Yes.

2 Q That would surprise you?

3 A Yes.

4 (Snider Exhibit No. 17 was marked
5 for identification.)

6 BY MR. BOGLE:

7 Q I hand you Exhibit 1.1909 marked as
8 Exhibit 17.

9 It says: "Population data for Weston,
10 West Virginia," indicated to have a population of
11 4,085 people. Do you see that?

12 MR. COLLINS: Objection. Lack of
13 foundation, lack of authentication, lack of
14 knowledge.

15 THE WITNESS: What year is this, please?

16 BY MR. BOGLE:

17 Q This is the current data.

18 MR. COLLINS: Yeah, I mean -- it's the
19 internet, it's accurate.

20 THE WITNESS: What's that?

21 MR. BOGLE: Well, I'm sure you guys are
22 going to produce census data that shows otherwise,
23 so we'll just wait to see that.

24 MR. COLLINS: I'll withdraw my

1 objection.

2 MR. BOGLE: I would hope so.

3 MR. COLLINS: It's a lack of foundation,
4 lack of knowledge.

5 BY MR. BOGLE:

6 Q 4,085 people, right? That's what it
7 says.

8 A That's what it says right here.

9 Q Right. That's wrong; is that your
10 testimony?

11 MR. COLLINS: Objection. Lack of
12 foundation. You haven't established the witness
13 has any knowledge about this issue.

14 MR. BOGLE: Well, he said he thought it
15 was wrong.

16 THE WITNESS: I said I was surprised,
17 and I am. I'm sorry.

18 BY MR. BOGLE:

19 Q You're surprised?

20 A Yes.

[REDACTED]

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[illegible]

[illegible]

[illegible]

A horizontal bar chart with 20 rows. Each row contains a small square icon on the left, followed by a text label, and then a horizontal bar representing a percentage. The bars are gray. The categories and their approximate percentages are as follows:

Category	Percentage
1. Overall satisfaction	85%
2. Service quality	78%
3. Product variety	92%
4. Price competitiveness	65%
5. Delivery speed	70%
6. Customer support	88%
7. Website usability	72%
8. Mobile app experience	80%
9. Return policy	75%
10. Payment options	82%
11. Shipping costs	68%
12. Packaging quality	76%
13. Product quality	89%
14. Brand reputation	73%
15. Customer loyalty	81%
16. Social media presence	77%
17. Environmental impact	69%
18. Ethical sourcing	74%
19. Community engagement	83%
20. Future growth potential	71%

[illegible]

A horizontal bar chart titled 'Percentage of respondents for various categories of people who have been in contact with someone who has been infected with COVID-19'. The chart displays nine categories on the y-axis and their corresponding percentages on the x-axis. The bars are gray and set against a light gray background with white grid lines. The categories and their percentages are: Family (85%), Friends (92%), Acquaintances (15%), Neighbors (10%), Colleagues (10%), Strangers (10%), Healthcare workers (90%), Public places (90%), and Other (15%).

Category	Percentage
Family	85%
Friends	92%
Acquaintances	15%
Neighbors	10%
Colleagues	10%
Strangers	10%
Healthcare workers	90%
Public places	90%
Other	15%

Category	Percentage
1. Very high	10%
2. High	10%
3. Medium	10%
4. Low	10%
5. Very low	10%
6. Not at all	10%
7. Don't know	10%
8. No answer	10%
9. No opinion	10%
10. No response	10%
11. No data	10%
12. No information	10%
13. No access	10%
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28. No benefit	10%
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30. No effect	10%
31. No impact	10%
32. No change	10%
33. No movement	10%
34. No action	10%
35. No decision	10%
36. No choice	10%
37. No option	10%
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75. No opinion	10%
76. No answer	10%
77. Don't know	10%
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79. Low	10%
80. Medium	10%
81. High	10%
82. Very high	10%

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[illegible]

[illegible]

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[illegible]

[illegible]

[illegible]

[illegible]

[illegible]

[illegible]

[REDACTED]

13 MR. COLLINS: Are you -- I'm sorry.

14 We've been going 70 minutes. Is this a good time
15 to break?

16 MR. BOGLE: That's fine. I'm moving to
17 a different pharmacy. That's fine.

18 THE VIDEOGRAPHER: The time is 12:47
19 p.m. We're going off the record.

20 (Lunch recess.)

21 THE VIDEOGRAPHER: The time is
22 1:35 p.m., and we're back on the record.

23 BY MR. BOGLE:

24 Q All right, Mr. Snider, we're back from

1 lunch. I wanted to pick up from where we were
2 talking about before we broke.



[illegible]

[illegible]

■

■

■

4 Q All right. Now, Lumberport, you
5 understand that's another very small city, right?

6 MR. COLLINS: Objection.

7 BY MR. BOGLE:

8 Q In West Virginia.

9 MR. COLLINS: Objection to form.

10 THE WITNESS: I don't remember.

11 BY MR. BOGLE:

12 Q Okay. Have you ever been to Lumberport?

13 A No, I don't remember being there.

14 Q Okay.

15 (Snider Exhibit No. 19 was marked
16 for identification.)

17 BY MR. BOGLE:

18 Q I hand you Exhibit 19.

19 Actually, let me ask you this: If the
20 census data indicated there were fewer than a
21 thousand people living in Lumberport, would you
22 have reason to dispute that?

23 MR. COLLINS: Again, foundation.

24 THE WITNESS: I wouldn't know. I'd have

1 no reason to dispute it.

2 BY MR. BOGLE:

3 Q Okay. Let's just take a look real quick
4 then. Exhibit 19, also marked as 1.1908, is what
5 I'm handing you.

6 All right. It's another printout with
7 population and other data. You see it's for
8 Lumberport, West Virginia?

9 A Yes, I see.

10 Q And this is the most current data that I
11 was able to obtain. The population noted here for
12 Lumberport is 881 people. Do you see that?

13 A Yes.

14 Q Okay. Do you have any specific
15 knowledge that would contradict that being the
16 most current population data for Lumberport?

17 MR. COLLINS: Objection. Foundation.

18 THE WITNESS: I don't have any knowledge
19 of the surrounding area of Lumberport.

20 BY MR. BOGLE:

21 Q Okay. All right. So let's go back to
22 Exhibit 1.1821, and I want to specifically look at
23 .19 is the page.

24 A Can you give me that exhibit again?

1 Q It's 1.1821, the page is .19. The page
2 should look like this (indicating).

3 MR. COLLINS: He's referring to the
4 numbers at the top.

5 THE WITNESS: Oh, 1821.19, okay.

6 BY MR. BOGLE:

7 Q Yeah.

8 A Thank you.

9 Q Are you at that page?

10 A Yes.

Government	Percentage
Current government	85%
Previous government	15%



Response	Percentage
Yes, the U.S. should take action to reduce greenhouse gas emissions	95%
No, the U.S. should not take action to reduce greenhouse gas emissions	5%

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[REDACTED]

[REDACTED]

12 A Yes, I do.

13 Q Okay. And Belington, West Virginia, do
14 you know anything about the population for that
15 city?

16 A No, I don't. I don't. I don't think I
17 remember being there.

18 Q Okay. Any reason to dispute they have
19 about 2,000 people in Belington, West Virginia?

20 MR. COLLINS: Objection. Foundation.

21 THE WITNESS: I wouldn't dispute that.
22 I don't know.

23 (Snider Exhibit No. 20 was marked
24 for identification.)

1 BY MR. BOGLE:

2 Q Okay. And I want to look at some of the
3 documentation on the Belington location. I hand
4 you Exhibit 20, also marked as Exhibit 1.1822.

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

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A horizontal bar chart with 20 rows. Each row has a small square marker on the left and a corresponding horizontal bar. The bars vary in length and position, representing percentages. The bars are gray, and the background is white. The chart is enclosed in a black rectangular frame.

Category	Percentage
1	85%
2	70%
3	30%
4	25%
5	30%
6	95%
7	90%
8	15%
9	25%
10	10%
11	85%
12	65%
13	95%
14	50%
15	30%
16	65%
17	95%
18	45%
19	15%
20	80%

1 Q Huh?

2 A I didn't produce it. I don't know.

3 Q I'm just asking you if you see the
4 police report in this packet related to this
5 pharmacy.

6 MR. COLLINS: Objection. Argumentative.

7 THE WITNESS: I don't see it in here.

8 BY MR. BOGLE:

9 Q Okay. Are you aware that ultimately one
10 of the owners of Best Care was prosecuted for
11 illegally diverting opioids?

12 A I am aware that an owner of Best Care
13 was prosecuted, and we cut them off.

14 Q Well, you're aware that there was a --
15 there was an arrest and a prosecution for one of
16 the owners of Best Care for diversion of opioid
17 products, right?

18 MR. COLLINS: Objection. Foundation.

19 THE WITNESS: I was aware that he was
20 arrested. That's all.

21 (Snider Exhibit No. 21 was marked
22 for identification.)

23 BY MR. BOGLE:

24 Q Okay. Let me hand you 1.1251,

1 Exhibit 21.

2 This is a news release from the U.S.
3 Department of Justice, June 3rd, 2014, titled
4 "Pharmacist charged with illegal distribution of
5 painkillers."

6 Do you see that?

7 A Yes.

8 Q Have you ever seen this press release
9 related to Best Care?

10 A No, I haven't.

11 Q Okay. How did you become aware of the
12 arrest then?

13 A I don't remember. Probably the DRA.

14 Q Okay. And if you look in the press
15 release, it says: "A West Virginia pharmacist has
16 been indicted on charges that he dispensed
17 prescription painkillers outside the scope of his
18 professional practice."

19 And then it says: "United States
20 Attorney William Ihlenfeld, II, announced that
21 Mario Blount, 51, of Bridgeport, West Virginia,
22 was arrested this morning on charges of conspiracy
23 to possess and distribute Schedule II controlled
24 substances, distribution of oxycodone and a

1 failure to report the filling of a prescription."

2 Do you see that?

3 A Yes.

4 Q And it says: "Blount, who was employed
5 by Best Care Pharmacy, is alleged to have
6 conspired with two other individuals over the last
7 three years to distribute prescription painkillers
8 for non-legitimate medical purposes."

9 Do you see that reference?

10 A Yes.

11 Q Okay. And skip a paragraph, the next
12 one says: "The Greater Harrison County Drug Task
13 Force executed search warrants in October 2013 at
14 Best Care Pharmacy locations in the West Virginia
15 towns of Bridgeport, Lumberport and Belington."

16 Do you see that?

17 A Yes.

18 Q And that's the three facilities we've
19 just been looking at over the last hour or so,
20 right?

21 A Yes.

22 Q And then the last paragraph on this page
23 says: "Mr. Blount abused the trust of the
24 citizens of Bridgeport and the customers of Best

1 Care Pharmacy. These arrests serve as a warning
2 that the illicit distribution of controlled
3 substances will not be tolerated in Harrison
4 County, said Karl C. Colder, Special Agent in
5 Charge, Drug Enforcement Administration,
6 Washington, D.C. Field Division. Over
7 approximately three years, Mr. Blount illegally
8 dispensed over 11,000 oxycodone and oxymorphone
9 pills."

10 Do you see that?

11 A I see that, yes.

12 Q And you know McKesson was the supplier
13 of those pills, right?

14 MR. COLLINS: Objection. Assumes facts
15 not in evidence, foundation.

16 THE WITNESS: I don't know that.

17 BY MR. BOGLE:

18 Q Well, your New Castle facility was
19 supplying Best Care with those very drugs during
20 that very time period, right?

21 MR. COLLINS: Objection. Argumentative,
22 assumes facts not in evidence.

23 THE WITNESS: I don't know that.

24 BY MR. BOGLE:

1 Q You don't know if you were supplying
2 them?

3 A No.

4 MR. COLLINS: Objection.

5 BY MR. BOGLE:

6 Q You don't know if Best Care Pharmacy was
7 a customer of yours for 2010 to 2014?

8 MR. COLLINS: Objection. Argumentative.

9 BY MR. BOGLE:

10 Q I'm just asking if you know or not.

11 MR. COLLINS: Objection. You just asked
12 the same -- you've asked the same question two or
13 three times.

14 THE WITNESS: I don't know.

15 BY MR. BOGLE:

16 Q You don't know?

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

1 MR. COLLINS: Objection. Assumes facts
2 not in evidence. The question is compound.

3 THE WITNESS: I don't -- I don't know
4 that. He could have other wholesalers. I don't
5 know that.

6 BY MR. BOGLE:

7 Q You don't even know if he had other
8 wholesalers?

9 A I don't remember that, no.

10 Q Okay.

11 A No.

12 Q Isn't that something you would need --
13 that you would want to know?

14 MR. COLLINS: Objection. Calls for a
15 legal conclusion, argumentative.

16 THE WITNESS: I would want the director
17 of Regulatory Affairs to know that.

18 BY MR. BOGLE:

19 Q You would want him to know that. It's
20 okay, as the guy who is responsible for making
21 sure that the New Castle isn't involved in
22 diversion, you don't care if you know that or not?

23 MR. COLLINS: Objection. Argumentative.
24 Object to the theatrics.

1 THE WITNESS: Can you restate the
2 question, if you want?

3 BY MR. BOGLE:

4 Q Well, I don't think there's anything
5 wrong with that question.

6 MR. COLLINS: Objection. It's --

7 THE WITNESS: Can you repeat it then?

8 BY MR. BOGLE:

9 Q Yeah.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10 MR. COLLINS: Objection. The
11 question --

12 BY MR. BOGLE:

13 Q Right?

14 MR. COLLINS: Well, the question is now
15 compound three times.

16 THE WITNESS: I -- I answered that, yes.

17 BY MR. BOGLE:

18 Q Yes, you were. Okay.

19 And you said this pharmacy was cut off.
20 They were cut off for about two weeks, right, Best
21 Care?

22 MR. COLLINS: Objection. Assumes facts
23 not in evidence, foundation.

24 THE WITNESS: I don't remember.

1 BY MR. BOGLE:

2 Q You don't remember?

3 A No.

4 Q Okay.

5 A That would be the director of Regulatory
6 Affairs.

7 Q Well, the pills come out of your
8 facility, right?

9 MR. COLLINS: Objection.

10 THE WITNESS: I don't know that. I
11 answered to that.

12 BY MR. BOGLE:

13 Q Does -- does Regulatory Affairs run your
14 facility?

15 MR. COLLINS: Objection. Form. The
16 question is vague.

17 BY MR. BOGLE:

18 Q I mean, do you defer all responsibility
19 for the pills that go out of New Castle to
20 Regulatory Affairs?

21 MR. COLLINS: Objection. Argumentative.

22 THE WITNESS: No.

23 BY MR. BOGLE:

24 Q Okay. Because that's -- it's your job,

1 right?

2 MR. COLLINS: Objection.

3 THE WITNESS: What's my job, please?

4 I'm not sure --

5 BY MR. BOGLE:

6 Q To know what's leaving your facility and
7 to whom it's going to and whether they can be
8 trusted.

9 A I didn't --

10 MR. COLLINS: Objection. The question
11 is compound, it's vague, calls for a legal
12 conclusion, lacks foundation.

13 BY MR. BOGLE:

14 Q I think it's a good question, so go
15 ahead.

16 MR. COLLINS: My objections stand.

17 THE WITNESS: I stand by my record and
18 what I do at the facility.

19 BY MR. BOGLE:

20 Q That's -- that's not my question, sir.

21 A That's the best I can answer.

22 Q My question is, is it your testimony
23 that your responsibilities as director of
24 operations at New Castle does not include knowing

[illegible]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

7 Q Okay. I'm going to hand you what I'm
8 marking as Exhibit 1.1794, also marked as
9 Exhibit 22.

10 (Snider Exhibit No. 22 was marked
11 for identification.)

12 BY MR. BOGLE:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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Category	Percentage
1. Very high	10%
2. High	25%
3. Medium	15%
4. Low	35%
5. Very low	10%
6. Not at all	5%
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8. No answer	5%
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A horizontal bar chart with 20 rows. Each row has a small square marker on the left and a corresponding horizontal bar. The bars vary in length and position, representing percentages. The markers are located at the following approximate horizontal positions: 10, 10, 10, 10, 10, 10, 10, 10, 10, 10, 10, 10, 10, 10, 10, 10, 10, 10, 10, 10. The bars are located at the following approximate horizontal positions: 10, 10, 10, 10, 10, 10, 10, 10, 10, 10, 10, 10, 10, 10, 10, 10, 10, 10, 10, 10.

Category	Percentage
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19	10%
20	10%

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[illegible]

A horizontal bar chart with 20 rows. Each row has a small square marker on the left, followed by a text label, and then a horizontal bar representing a percentage. The bars are gray. The labels are: 1. Very satisfied, 2. Satisfied, 3. Dissatisfied, 4. Very dissatisfied, 5. Don't know, 6. Very satisfied, 7. Satisfied, 8. Dissatisfied, 9. Very dissatisfied, 10. Don't know, 11. Very satisfied, 12. Satisfied, 13. Dissatisfied, 14. Very dissatisfied, 15. Don't know, 16. Very satisfied, 17. Satisfied, 18. Dissatisfied, 19. Very dissatisfied, 20. Don't know. The percentages are approximately: 1. 35%, 2. 65%, 3. 85%, 4. 75%, 5. 15%, 6. 95%, 7. 10%, 8. 15%, 9. 90%, 10. 85%, 11. 10%, 12. 85%, 13. 10%, 14. 90%, 15. 15%, 16. 85%, 17. 85%, 18. 75%, 19. 85%, 20. 85%.

Category	Percentage
Very satisfied	35%
Satisfied	65%
Dissatisfied	85%
Very dissatisfied	75%
Don't know	15%
Very satisfied	95%
Satisfied	10%
Dissatisfied	15%
Very dissatisfied	90%
Don't know	85%
Very satisfied	10%
Satisfied	85%
Dissatisfied	10%
Very dissatisfied	90%
Don't know	15%
Very satisfied	85%
Satisfied	85%
Dissatisfied	75%
Very dissatisfied	85%
Don't know	85%

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Highly Confidential - Subject to Further Confidentiality Review

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■		■	[REDACTED]
■		[REDACTED]	[REDACTED]

[REDACTED]

19 (Snider Exhibit No. 30 was marked
20 for identification.)

21 BY MR. BOGLE:

22 Q Okay. I'm going to hand you what's
23 marked as Exhibit 30, 1.1905.

24 Do you see it's another DOJ press

1 release from November 2nd, 2018, just a few days
2 ago. And the title is "Johnstown pharmacist
3 charged with -- charged in 109-count indictment
4 with illegally creating bogus prescriptions and
5 then dispensing the drugs."

6 Do you see that title?

7 A Yes, I do.

8 Q Okay. Thereafter it says: "A
9 Johnstown, PA, pharmacist has been indicted by a
10 federal grand jury in Pittsburgh on charges of
11 dispensing and distributing controlled substances
12 and conspiring to distribute and dispense
13 controlled substances, by United States Attorney
14 Scott W. Brady announced today."

15 Then it says: "The 109-count indictment
16 returned on October 30th named Joseph M. Martella,
17 53, of Johnstown, Pennsylvania."

18 Then it says: "According to the
19 indictment presented to the court, Martella owned
20 and operated Martella's Pharmacy located on
21 Franklin Street in Johnstown. The indictment
22 alleges that Martella, a pharmacist, conspired
23 with Dr. Peter James Ridella, who previously
24 pleaded guilty, and with an individual known as JR

1 to create and submit unlawful prescriptions for
2 oxycodone; oxycodone and acetaminophen, also known
3 as Percocet; oxymorphone, also known as Opana;
4 morphine sulfate, also known MS Contin; and
5 hydrocodone and acetaminophen, also known as
6 Vicodin, and then unlawfully dispensed those
7 controlled substances to other persons."

8 Do you see that?

9 A I see that, yeah.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8 Q Okay.

9 (Snider Exhibit No. 31 was marked
10 for identification.)

11 BY MR. BOGLE:

12 Q I'm handing you Exhibit 31 to your
13 deposition, 1.1904.

14 This is the actual indictment for
15 Martella's. And if you look to the point I just
16 asked you about the covered period for this
17 conduct, on page 10, do you see the paragraph
18 starts there "From in and around"?

19 MR. COLLINS: I'm sorry. Can I have a
20 proffer as to the relevance of this? It certainly
21 doesn't involve Summit County, it doesn't involve
22 Cuyahoga County, it doesn't involve the cities of
23 Cleveland or Canton. Can I have a proffer as to
24 the relevance?

1 MR. BOGLE: No.

2 MR. COLLINS: Okay.

3 MR. BOGLE: You're entitled to nothing
4 of the sort.

5 MR. COLLINS: Okay. Well --

6 BY MR. BOGLE:

7 Q "From in and around April 2011 and
8 continuing thereafter to in and around June 2016
9 in the Western District of Pennsylvania, the
10 Defendant Joseph M. Martella," and it goes on to
11 repeat sort of the allegations I talked about as
12 far as the diversion of controlled substances,
13 including opioids.

14 Do you see that?

15 A Yes, I see it.

[REDACTED]

[illegible]

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[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

18 MR. COLLINS: What's the question?

19 BY MR. BOGLE:

20 Q Do you see that?

21 MR. COLLINS: I'm sorry. That's not a
22 proper question. You need to ask a legitimate,
23 proper question.

24 MR. BOGLE: No, I'm good with that one.

1 BY MR. BOGLE:

2 Q Do you see that?

3 MR. COLLINS: See what?

4 BY MR. BOGLE:

5 Q See that in the indictment? The covered
6 period was just a few months after the threshold
7 that you said you upped.

8 MR. COLLINS: Objection.
9 Mischaracterization.

10 BY MR. BOGLE:

11 Q For hydrocodone and methadone for this
12 pharmacy.

13 MR. COLLINS: Objection. The question
14 is compound. It's also argumentative.

15 THE WITNESS: I see what it says now.

16 MR. BOGLE: I'm moving to a whole other
17 topic area. If we can take a break, and we'll
18 reload documents.

19 THE VIDEOGRAPHER: The time is 2:47 p.m.
20 We're going off the record.

21 (Recess.)

22 THE VIDEOGRAPHER: The time is 3:03 p.m.
23 We're back on the record.

24 BY MR. BOGLE:

1 Q All right. Mr. Snider, I want to shift
2 gears to a different topic area.

3 We talked about earlier that Ohio was
4 one of the states that customers -- that your New
5 Castle Distribution Center services, right?

6 A Yes.

7 Q And you know that Ohio in recent years
8 has had a high level of abuse and diversion of
9 opioids within that state, right?

10 MR. COLLINS: Objection. Form.
11 Foundation.

12 THE WITNESS: I know it's in the papers,
13 yes.

14 BY MR. BOGLE:

15 Q Okay. And you've read those stats,
16 right?

17 A Yes.

18 Q On that topic.

19 MR. COLLINS: Objection. Form.

20 THE WITNESS: Yeah.

21 BY MR. BOGLE:

22 Q Okay. I want to hand you what I'm
23 marking as Exhibit 1.1434, so Exhibit 32.

24 (Snider Exhibit No. 32 was marked

1 for identification.)

2 BY MR. BOGLE:

█ █ [REDACTED]

█ [REDACTED] █

█ [REDACTED]

█ [REDACTED] [REDACTED] [REDACTED]

█ [REDACTED] █ [REDACTED]

█ [REDACTED]

█ █ [REDACTED] [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ █ [REDACTED]

█ █ [REDACTED]

█ [REDACTED]

█ █ [REDACTED]

18 Q Okay. So that's a meeting you would

19 have attended, right?

20 A What year is it?

21 MR. COLLINS: Objection.

22 BY MR. BOGLE:

23 Q 2014.

24 MR. COLLINS: Objection. Form.

1 THE WITNESS: I don't know if I attended
2 that one.

3 BY MR. BOGLE:

4 Q Okay. Is that a meeting you generally
5 would attend?

6 A Normally, I do. I'm not sure, in 2014,
7 I was exempted because I believe I was -- that's
8 when I was putting up a new distribution center in
9 Delran.

10 Q Okay. Would you have -- if you did not
11 attend this specific session, would you generally
12 have requested the materials that were passed
13 out --

14 MR. COLLINS: Objection.

15 BY MR. BOGLE:

16 Q -- so you could catch up to speed?

17 MR. COLLINS: Objection. Form.

18 THE WITNESS: I certainly would think
19 so, yes.

20 BY MR. BOGLE:

21 Q Okay. So I want to look at the -- just
22 one slide from this PowerPoint deck that was
23 presented in 2014. If you go to page .13.

24 Do you see there is a slide titled

[illegible]

Category	Percentage
1. Very high	100%
2. High	100%
3. Medium	100%
4. Low	100%
5. Very low	100%
6. Not at all	100%
7. Don't know	100%
8. No answer	100%
9. Other	100%
10. No response	100%
11. No data	100%
12. No information	100%
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[REDACTED]

[illegible]

[illegible]

[illegible]

[illegible]

24

Do you see that?

1 A Yes.

2 Q Okay. So does this jog your memory at
3 all about any discussions about Summit Pain
4 Specialists?

5 A No. I don't even know if we put them on
6 as a customer, and I don't know Kim Diemand or
7 Steve Kravec was a sales exec. I don't really
8 know him very well.

9 Q Okay. And you said Acme Pharmacy
10 doesn't ring a bell for you either, huh?

11 A No, I'm sorry.

12 Q Okay.

13 A We don't have them now, I know that.

14 Q I agree with that.

15 (Snider Exhibit No. 35 was marked
16 for identification.)

17 BY MR. BOGLE:

18 Q Well, let's take a look then at the next
19 exhibit, 1.1870, which is also Exhibit 35.

20 MR. COLLINS: What number?

21 MR. BOGLE: Exhibit 35.

22 MR. COLLINS: Thank you.

23 BY MR. BOGLE:

24 Q Okay. And you see this is an e-mail

[illegible]

[illegible]

[illegible]

[illegible]

[illegible]

A 20x20 grid of gray squares. The squares are of varying sizes and are positioned at various coordinates within the grid, creating a sparse, abstract pattern that vaguely resembles the letter 'A'.

22 BY MR. BOGLE:

23 Q Do you think he didn't?

24 A I don't know.

1 Q Okay. Well, if you go back to
2 Exhibit 1.1568, which is Exhibit 9. Keep that one
3 out there with the 70,000 doses.

4 A That what, keep --

5 Q Keep that next to you, but I want you to
6 pull this one out too, Exhibit 9.

7 A Nine?

8 Q Yeah.

9 MR. COLLINS: I think they should be in
10 order.

11 THE WITNESS: Well, kind of.

12 MR. COLLINS: Let me get mine.

13 BY MR. BOGLE:

14 Q You got Exhibit 9?

15 A Yes.

[REDACTED]

[illegible]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8 Q Okay. And you understand that when you
9 get copied on something, you get included on the
10 whole -- you get to see the whole chain before it,
11 right?

12 MR. COLLINS: Objection to the form.

13 BY MR. BOGLE:

14 Q That's how e-mails work, right?

15 A I do know how e-mails work --

16 Q Right.

17 A -- but I don't remember this e-mail
18 ever.

19 Q Okay. That's fair.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Category	Sub-category	Percentage
Agreeableness	Agreeableness	45%
	Agreeableness	35%
	Agreeableness	40%
	Agreeableness	40%
Conscientiousness	Conscientiousness	45%
	Conscientiousness	35%
	Conscientiousness	40%
	Conscientiousness	40%
Neuroticism	Neuroticism	45%
	Neuroticism	35%
	Neuroticism	40%
	Neuroticism	40%
Openness	Openness	45%
	Openness	35%
	Openness	40%
	Openness	40%
Extraversion	Extraversion	45%
	Extraversion	35%
	Extraversion	40%
	Extraversion	40%

18 Q Okay. Well, you're on the e-mail chain,
19 right? You're saying you never read this e-mail
20 chain?

21 A I don't remember reading it, no.

22 Q Okay. But are you saying you didn't
23 read it definitively?

24 MR. COLLINS: Objection. Argumentative.

1 THE WITNESS: I'll testify that I don't
2 remember reading it. I don't even remember the
3 Acme.

4 BY MR. BOGLE:

5 Q Do you typically not read e-mails
6 you're -- you're copied on?

7 MR. COLLINS: Objection. Argumentative.

8 THE WITNESS: I can't say typically.

9 BY MR. BOGLE:

[REDACTED]

A horizontal bar chart with 20 rows. Each row has a small square icon on the left, followed by a label, and then a horizontal bar representing a percentage. The bars are gray and set against a light gray background. The labels are as follows:

- Row 1: [Icon] [Label]
- Row 2: [Icon] [Label]
- Row 3: [Icon] [Label]
- Row 4: [Icon] [Label]
- Row 5: [Icon] [Label]
- Row 6: [Icon] [Label]
- Row 7: [Icon] [Label]
- Row 8: [Icon] [Label]
- Row 9: [Icon] [Label]
- Row 10: [Icon] [Label]
- Row 11: [Icon] [Label]
- Row 12: [Icon] [Label]
- Row 13: [Icon] [Label]
- Row 14: [Icon] [Label]
- Row 15: [Icon] [Label]
- Row 16: [Icon] [Label]
- Row 17: [Icon] [Label]
- Row 18: [Icon] [Label]
- Row 19: [Icon] [Label]
- Row 20: [Icon] [Label]

The bars represent the following approximate percentages:

Category	Percentage
[Label]	75%
[Label]	55%
[Label]	35%
[Label]	65%
[Label]	25%
[Label]	45%
[Label]	15%
[Label]	30%
[Label]	70%
[Label]	80%
[Label]	60%
[Label]	90%
[Label]	50%
[Label]	85%
[Label]	75%
[Label]	95%
[Label]	20%
[Label]	65%
[Label]	80%
[Label]	98%
[Label]	70%
[Label]	85%
[Label]	80%

Category	Percentage
1. Very high	10%
2. High	5%
3. Medium	15%
4. Low	10%
5. Very low	5%
6. Not at all	10%
7. Don't know	5%
8. No answer	10%
9. No opinion	10%
10. No response	10%
11. No data	10%
12. No information	10%
13. No access	10%
14. No contact	10%
15. No communication	10%
16. No interaction	10%
17. No participation	10%
18. No involvement	10%
19. No engagement	10%
20. No contribution	10%
21. No input	10%
22. No output	10%
23. No result	10%
24. No achievement	10%
25. No success	10%
26. No failure	10%
27. No loss	10%
28. No gain	10%
29. No benefit	10%
30. No harm	10%
31. No risk	10%
32. No danger	10%
33. No threat	10%
34. No danger	10%
35. No risk	10%
36. No harm	10%
37. No benefit	10%
38. No gain	10%
39. No loss	10%
40. No failure	10%
41. No success	10%
42. No achievement	10%
43. No result	10%
44. No output	10%
45. No input	10%
46. No contribution	10%
47. No engagement	10%
48. No involvement	10%
49. No participation	10%
50. No interaction	10%
51. No communication	10%
52. No contact	10%
53. No access	10%
54. No information	10%
55. No data	10%
56. No response	10%
57. No opinion	10%
58. No answer	10%
59. Don't know	10%
60. Not at all	10%
61. Low	10%
62. Medium	10%
63. High	10%
64. Very high	10%

[illegible]

Category	Percentage
1. Very high	100%
2. High	100%
3. Medium	100%
4. Low	100%
5. Very low	100%
6. Not at all	100%
7. Don't know	100%
8. No answer	100%
9. No opinion	100%
10. No response	100%
11. No data	100%
12. No information	100%
13. No knowledge	100%
14. No experience	100%
15. No contact	100%
16. No interaction	100%
17. No communication	100%
18. No connection	100%
19. No relationship	100%
20. No association	100%
21. No link	100%
22. No tie	100%
23. No bond	100%
24. No纽带	100%
25. No纽带	100%
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99. No纽带	100%
100. No纽带	100%

[illegible]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8 Q Sir, this was provided to us. I can
9 tell you -- if it's wrong, I guarantee you your
10 counsel will establish it's wrong. It ain't
11 wrong. Okay?

12 This is Acme Pharmacy. This was
13 provided to us from your counsel coming from
14 McKesson's files.

15 A I'm --

16 MR. COLLINS: Objection.

17 BY MR. BOGLE:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[illegible]

[illegible]

[illegible]

Response	Percentage
Yes, the U.S. should take action to reduce global warming	90%
No, the U.S. should not take action to reduce global warming	10%

[illegible]

10 | **Journal of Management Inquiry** 26(1)

Response	Percentage
Yes, the U.S. should take action to reduce greenhouse gas emissions	85%
No, the U.S. should not take action to reduce greenhouse gas emissions	15%

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Response	Percentage
Yes, the U.S. should take action to reduce greenhouse gas emissions	95%
No, the U.S. should not take action to reduce greenhouse gas emissions	5%

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8 Q Not aware of that?

9 I hand you what I'm marking Exhibit 39,
10 Exhibit 1.1895.

11 (Snider Exhibit No. 39 was marked
12 for identification.)

13 BY MR. BOGLE:

14 Q This is an article from the Akron Beacon
15 Journal/Ohio.com titled "Stow Pain Clinic closing
16 after court upholds sexual imposition conviction
17 against doctor accused of abusing patients,"
18 posted August 11, 2016. Do you see that?

19 A I see that, yes.

20 Q Okay. The first sentence says: "Summit
21 Pain Specialists in Stow is permanently closed
22 Monday after years of wrangling over a sex abuse
23 scandal involving a doctor there."

24 Do you see that?

1 A I see that, yes.

2 Q The third paragraph there says: "But
3 the Ohio Supreme Court on August 3 upheld the
4 Summit County Common Pleas Court conviction a
5 former doctor James Bressi, who once co-owned the
6 business with former doctor Robert Stephen
7 Geiger."

8 Do you see that?

9 A No. Can you tell me where you are?
10 I -- I was under what prompted the clinic to
11 close.

12 Q Right here, sir, if you look at my
13 finger.

14 A I'm sorry. You skipped around. I
15 didn't see that.

16 Q You want me to reread that for you?

17 A Please.

18 Q So you can follow along.

19 A Please.

20 Q That's fair.

21 The portion I read says: "But the Ohio
22 Supreme Court on August 3 upheld the Summit County
23 Common Please Court conviction of former
24 doctor James Bressi, who once co-owned the

1 business with former doctor Robert Stephen Geiger.
2 The clinic's troubles started in 2012 when
3 patients began calling Stow police reporting they
4 had been sexually abused by Bressi inside the pain
5 clinic. Stow police ultimately took reports from
6 about 95 patients, including some in their 70s,
7 who made similar claims according to a detective's
8 court testimony."

9 Do you see that?

10 A I see that, yes.

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Response	Percentage
Yes, the U.S. should take action to protect the environment	85%
No, the U.S. should not take action to protect the environment	15%

■ ■ ■

2 Q Okay. Do you have any reason to dispute
3 that pretty quickly after Summit Pain Specialists
4 closed so did Acme 30?

5 MR. COLLINS: Objection. Foundation,
6 form.

7 THE WITNESS: I do not know or remember
8 any of that. I'm sorry.

9 BY MR. BOGLE:

10 Q Okay. Well, let's just close the loop
11 here.

12 (Snider Exhibit No. 40 was marked
13 for identification.)

14 BY MR. BOGLE:

15 Q Exhibit 40, 1.1911. I pulled this off
16 of Google before I came, pertaining to Acme
17 Pharmacy in Stow, Ohio. Same address as we just
18 saw in the investigative report.

19 Do you see it's noted to be permanently
20 closed?

21 MR. COLLINS: Objection. Foundation.

22 THE WITNESS: If you say -- I don't see
23 where it says that. Please point to it.

24 Permanently closed, yes.

1 BY MR. BOGLE:

2 Q Okay. But again, this is not a customer
3 you ever even recall dealing with at all, right?

4 A I don't think I was in New Castle at the
5 time. I was in Delran, New Jersey.

6 Q You weren't in New Castle at all from
7 when you -- this account started getting serviced
8 in 2012 to 2016 when that -- it closed?

9 A I was there in 2012, yes.

10 Q Okay. For what period of time were you
11 not at New Castle then?

12 A '14 and '15 or '15, '16. I don't
13 remember.

14 Q Who was running New Castle while you
15 were gone?

16 A Andrew Moore, the VP/GM.

17 Q Andrew Moore?

18 A Yes.

19 Q Okay. Did you have any communications
20 concerning New Castle during that time period that
21 you were in Delran?

22 A Not too many.

23 Q Okay. There are many Giant Eagle
24 Pharmacies that -- in Summit and Cuyahoga County

1 that New Castle supplies opioids to, correct?

2 A Supplied. We don't have them any
3 longer.

4 Q Okay. When did you stop?

5 A About a year ago -- less than a year
6 ago.

7 Q Okay. Do you know why you stopped
8 providing to them out of New Castle?

9 A They got another wholesaler.

10 Q Okay. Who?

11 A Cardinal.

12 Q Okay. All right. So prior to losing
13 that business, you said about a year ago, that was
14 one of the larger customers you had in Summit and
15 Cuyahoga counties, right?

16 A Yes.

17 MR. COLLINS: Are we done with these?

18 MR. BOGLE: Yeah.

19 BY MR. BOGLE:

■ ■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ ■ [REDACTED]

Category	Percentage
1. 100%	100%
2. 100%	100%
3. 100%	100%
4. 100%	100%
5. 100%	100%
6. 100%	100%
7. 100%	100%
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92. 100%	100%
93. 100%	100%
94. 100%	100%
95. 100%	100%
96. 100%	100%
97. 100%	100%
98. 100%	100%
99. 100%	100%
100. 100%	100%

A horizontal bar chart with 20 rows. Each row has a small square marker on the left and a corresponding horizontal bar. The bars vary in length and position, representing percentages. The categories are not explicitly labeled, but the bars represent data points for each row.

Row	Percentage (%)
1	45
2	25
3	85
4	95
5	65
6	35
7	85
8	95
9	95
10	55
11	25
12	85
13	55
14	85
15	85
16	85
17	55
18	25
19	85
20	55

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83																	

A horizontal bar chart with 20 rows. Each row has a small square marker on the left and a corresponding horizontal bar. The bars vary in length and position, representing percentages. The categories are not explicitly labeled, but the bars represent data points for each category.

Category	Percentage
1	65%
2	35%
3	85%
4	20%
5	45%
6	10%
7	15%
8	90%
9	75%
10	85%
11	65%
12	10%
13	15%
14	85%
15	90%
16	55%
17	65%
18	85%
19	20%
20	30%

Highly Confidential - Subject to Further Confidentiality Review

■	[REDACTED]		
■		■	[REDACTED]
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■	[REDACTED]		
■	[REDACTED]		
■		[REDACTED]	[REDACTED]
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■	[REDACTED]		
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■			[REDACTED]
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■			[REDACTED]
■			[REDACTED]

A horizontal bar chart comparing the percentage of respondents reporting different types of violence against women, categorized by gender (Male and Female). The Y-axis lists 20 types of violence, and the X-axis shows percentages from 0% to 100% in 10% increments. For each category, there are two bars: a light blue bar for 'Male' and a dark blue bar for 'Female'. The data is as follows:

Type of Violence	Male (%)	Female (%)
Physical violence	10	10
Sexual violence	10	10
Psychological violence	10	10
Stalking	10	10
Harassment	10	10
Verbal abuse	10	10
Physical violence	10	10
Sexual violence	10	10
Psychological violence	10	10
Stalking	10	10
Harassment	10	10
Verbal abuse	10	10
Physical violence	10	10
Sexual violence	10	10
Psychological violence	10	10
Stalking	10	10
Harassment	10	10
Verbal abuse	10	10
Physical violence	10	10
Sexual violence	10	10
Psychological violence	10	10
Stalking	10	10
Harassment	10	10
Verbal abuse	10	10

Government	Percentage
Current government	85%
Previous government	15%

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9 Q Okay. All right. We're done with that.

10 MR. COLLINS: When would be a good time

11 to take a break?

12 MR. BOGLE: It's fine now. Yeah, if he

13 needs it, that's fine.

14 THE VIDEOGRAPHER: The time is 3:56 p.m.

15 We're going off the record.

16 (Recess.)

17 THE VIDEOGRAPHER: The time is 4:08 p.m.

18 We're back on the record.

19 BY MR. BOGLE:

20 Q Okay, Mr. Snider, we had stopped --

21 broken after talking about some of the Giant Eagle

22 Pharmacies, and I want to talk about a couple more

23 of those from Summit and Cuyahoga County.

24 (Snider Exhibit No. 43 was marked

1 for identification.)

2 BY MR. BOGLE:

3 Q I'm going to hand you what's marked as

4 1.1811, Exhibit 43.

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Horizontal bar chart showing the percentage of respondents for various categories of people who have been in contact with someone who has been infected with COVID-19. The categories are: Family, Friends, Acquaintances, Neighbors, Colleagues, Strangers, Healthcare workers, Public places, and Other. The percentages are: Family (85%), Friends (75%), Acquaintances (65%), Neighbors (45%), Colleagues (35%), Strangers (25%), Healthcare workers (15%), Public places (10%), and Other (5%).

Category	Percentage
Family	85%
Friends	75%
Acquaintances	65%
Neighbors	45%
Colleagues	35%
Strangers	25%
Healthcare workers	15%
Public places	10%
Other	5%

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A horizontal bar chart with 20 rows. Each row has a small square marker on the left and a corresponding horizontal bar. The bars vary in length and position, representing percentages. The categories are not explicitly labeled, but the bars represent data points for each category.

Category	Percentage
1	85%
2	55%
3	45%
4	25%
5	85%
6	85%
7	80%
8	65%
9	65%
10	55%
11	25%
12	25%
13	85%
14	85%
15	75%
16	25%
17	80%
18	65%
19	85%
20	60%

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437	438	439	440

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A horizontal bar chart with 20 rows. Each row has a small square icon on the left, followed by a category name, and then a horizontal bar representing a percentage. The categories and their approximate percentages are as follows:

Category	Percentage
1. All respondents	100%
2. Respondents who have been in the U.S. for 10 years or more	75%
3. Respondents who have been in the U.S. for 5 years or more	85%
4. Respondents who have been in the U.S. for 1 year or more	95%
5. Respondents who have been in the U.S. for less than 1 year	5%
6. Respondents who are U.S. citizens	25%
7. Respondents who are permanent residents	45%
8. Respondents who are temporary residents	30%
9. Respondents who are undocumented immigrants	15%
10. Respondents who are naturalized citizens	65%
11. Respondents who are U.S. born	80%
12. Respondents who are foreign born	20%
13. Respondents who are U.S. born and raised	70%
14. Respondents who are foreign born and raised	30%
15. Respondents who are U.S. born and raised in the U.S.	90%
16. Respondents who are foreign born and raised in the U.S.	10%
17. Respondents who are U.S. born and raised in the U.S. and have U.S. citizenship	85%
18. Respondents who are foreign born and raised in the U.S. and have U.S. citizenship	15%
19. Respondents who are U.S. born and raised in the U.S. and have U.S. citizenship and are U.S. citizens	95%
20. Respondents who are foreign born and raised in the U.S. and have U.S. citizenship and are U.S. citizens	5%

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[REDACTED]

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[REDACTED]

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8 Q You do know that McKesson ultimately in
9 2016 paid a \$150 million fine for violations of
10 the Controlled Substances Act, right?

11 MR. COLLINS: Objection. Calls for a
12 legal conclusion.

13 BY MR. BOGLE:

14 Q Do you know whether that occurred?

15 MR. COLLINS: I'm sorry. Lack of
16 foundation. Form.

17 BY MR. BOGLE:

18 Q Do you know that?

19 A I heard it was a settlement with the
20 DEA.

21 Q Okay. Do --

22 A And that's what I was told.

23 Q You weren't told how much?

24 A I was told it was --

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[REDACTED]

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9 Q If you can go back to Exhibit 9 real
10 quick. And keep this one I'm looking at with you
11 out too, but...

12 A Eight.

13 MR. COLLINS: One more. Getting warmer.

14 THE WITNESS: 10.

15 MR. COLLINS: Getting warmer.

16 THE WITNESS: 11. Sorry. Where is 9?

17 It has to be behind there. I'm sorry. 15. I
18 don't see 9 here. Let me look at that other --

19 BY MR. BOGLE:

20 Q You can follow me up on the screen if
21 you want. It doesn't matter to me.

22 MR. COLLINS: It's got to be in this
23 stack.

24 THE WITNESS: If it's okay with you, I

1 will go ahead and follow it here.

2 BY MR. BOGLE:

█ █ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

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Highly Confidential - Subject to Further Confidentiality Review

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[illegible]

20 MR. BOGLE: No further questions at this
21 time.

22 MR. COLLINS: Why don't we take five
23 minutes? I have some redirect.

24 THE VIDEOGRAPHER: The time is 4:59 p.m.

1 We're going off the record.

2 (Recess.)

3 THE VIDEOGRAPHER: The time is 5:12

4 p.m., and we're back on the record.

5 REDIRECT EXAMINATION

6 BY MR. COLLINS:

7 Q Good afternoon, Mr. Snider.

8 A Good afternoon.

9 Q I'm Kevin Collins.

10 A Yes.

11 Q Where do you currently live?

12 A I currently live in -- south of
13 Youngstown, Ohio -- Poland, Ohio.

14 Q Can you keep your voice up. I know it's
15 been a long day. One more time?

16 A Poland, Ohio.

17 Q Okay. And what county is that?

18 A It's Mahoning County.

19 Q All right. And where is that county
20 related to Summit and Cuyahoga counties?

21 A It's about three or four counties over
22 east, directly east towards the PA line.

23 Q And how long have you resided there?

24 A Twenty -- 18 years.

1 Q All right. Where were you born and
2 raised?

3 A I was born in Coshocton, Ohio, and was
4 raised in Cuyahoga Falls in Summit County.

5 Q Where did you go to high school?

6 A Cuyahoga Falls High School.

7 Q What did you do after high school?

8 A I went to Kent State University.

9 Q And after Kent State, when did you
10 graduate?

11 A I graduated in -- I'm sorry -- 1978.
12 Sorry. That's a long time ago.

13 Q Okay. And when did you start working
14 for McKesson?

15 A I believe '79, '80.

16 Q Can you briefly describe the positions
17 you've held, starting from your earliest position
18 at McKesson to your current position and where --
19 where you were located.

20 A Okay. Sure. Started in North Canton,
21 Ohio. I don't remember exactly how long, but I
22 was first a trainee for a couple of months, and
23 then a night supervisor after that couple of
24 months of -- in there. And then I did that for

1 quite a few years, and then I got promoted to
2 operations manager there, and I'm not sure what
3 year that was. It would be on -- probably on my
4 resume, but I don't remember.

5 And then after that, we built a new
6 facility in Cincinnati, Ohio. Fairfield, Ohio, to
7 be exact. And I ran -- I went there as the
8 operations manager. And I --

9 Q What year was that?

10 A 1978. No, '75. I think so.

11 Q Would it be --

12 A No, no. No, no. I'm sorry. I have the
13 wrong -- '95 or '6. Sorry about that.

14 Q I'm sorry. Where did you go after that?

15 A After Cincinnati, I went back to North
16 Canton, and then they promoted me to distribution
17 center manager over in Sewickley, Pennsylvania,
18 and after that I was promoted to manager over
19 Sewickley and North Canton. And we had closed
20 Cincinnati, and then we closed North Canton, which
21 was in Stark County, and we combined it into New
22 Castle in 2000, and I was made the director of
23 operations there.

24 Q So is it true that the New Castle

1 facility opened in 2000?

2 A Yes. May of 2000.

3 Q And when it opened, what was your title?

4 A I don't remember if it was DCM or DO,
5 but it was one of those, and I ran the
6 distribution center. We got -- started it up, and
7 then I'm still there. So I've always been in the
8 Ohio/PA market.

9 Q What geographic territory does the New
10 Castle distribution service -- distribution center
11 service?

12 A Our distribution center services -- if I
13 could say what towns, you might know, but on the
14 east is State College, which is the -- central PA;
15 on the north is Erie, Pennsylvania, which is the
16 north side; northwest is -- is Cleveland; and then
17 southwest would be down to the Zanesville area;
18 and then south would be -- I believe it was
19 Morgantown, Weston; and then back up to New
20 Castle. So we're in the geographic center.

21 Q How many employees do you manage?

22 A About 133 right now.

23 Q And how many employees are direct
24 reports to you?

1 A About ten.

2 Q In your almost 19 years of managing the
3 New Castle Distribution Center, how would you
4 describe the performance of the distribution
5 center?

6 MR. BOGLE: Object to form, vague and
7 ambiguous.

8 THE WITNESS: The distribution center
9 won the DC of the year seven times, and that's
10 twice as many as any other distribution center has
11 received that, and that's based on the quality and
12 the performance of the distribution center.

13 BY MR. COLLINS:

14 Q Are there ever any internal audits
15 performed about the operations of the distribution
16 center at New Castle?

17 A Yes. We have four or five kinds of
18 audits. The first kind is called a STARS audit
19 that we do internally to match our SOPs to our
20 performance. And that's done -- right now it's
21 done by an accounting team. But before that, all
22 those years, it was done by McKesson Regulatory
23 Affairs folks.

24 Then we have a specific --

1 Q I'm sorry. Can you tell me how often
2 that's done?

3 A Every two, two-and-a-half years.

4 Q Okay. And the next -- the other audit
5 you were going to describe?

6 A Yes. Sorry. The next audit is the DEA
7 cyclic audit or any DEA unannounced audit. So
8 we've had cyclic audits average two-and-a-half
9 years. They try to do them every two years,
10 but -- so I believe there were four audits at the
11 distribution center by the DEA, and they've all
12 came out as -- a hundred percent as exemplary. So
13 that was one of the other audits.

14 And then monthly, we did the triannual
15 report, which was a DEA SOPs. And then also we
16 did a VAWD audit, which is the National Wholesale
17 Association. We do that every two to five years
18 depending on our licensure. We were one of the
19 first DCs to get VAWD accreditation.

20 So when the DEA or we do our audits, we
21 check our licensing and numerous other things, but
22 the DEA has been in there a few times, and they've
23 always had exemplary comments for New Castle and
24 our team.

1 (Snider Exhibit No. 52 was marked
2 for identification.)

3 BY MR. COLLINS:

4 Q I'm going to hand you what's been
5 premarked as Exhibit 52.

6 Mr. Snider, can I ask you to identify
7 what is Exhibit 52?

■ ■ [REDACTED]
■ [REDACTED]
■ ■ [REDACTED]
■ ■ [REDACTED]
■ [REDACTED]
■ [REDACTED]
■ [REDACTED]
■ [REDACTED]

16 Q Has the DEA ever complained to you about
17 your operations at the New Castle Distribution
18 Center?

19 MR. BOGLE: Object to form.

20 THE WITNESS: No. They've always
21 said -- I know Kurt Dittmer, who was there before.
22 Patty Robson is there right now as interim agent
23 in charge, and before that we had -- I knew Jim
24 Crawford, and all of them have given us exemplary

1 records.

2 BY MR. COLLINS:

3 Q Have you ever received -- or has the
4 distribution center ever received any kind of
5 minor infraction or citation from the DEA?

6 MR. BOGLE: Object to form.

7 THE WITNESS: Never.

8 BY MR. COLLINS:

9 Q In terms of the New Castle Distribution
10 Center operations, on average, what's the volume
11 of the pharmaceuticals that you distribute per
12 day?

13 A We do about 150,000 pieces a day to
14 200,000, depending on the day.

15 Q And when you say "pieces," what do you
16 mean? Is that -- is that a tablet or --

17 A A bottle or pill, or even sometimes a
18 case. It depends on the selling unit.

19 Q 150,000 pieces?

20 A Minimum.

21 Q And how many -- what portion of that is
22 controlled substances?

23 A About fourteen to 15,000. Total for
24 Class II, III, IV and V.

1 Q And in terms of opioids, what's the
2 percentage of the product that is moved out of the
3 distribution center each day that is an opioid?

4 MR. BOGLE: Object to form as to time,
5 vague and ambiguous.

6 MR. COLLINS: And I -- fair enough. I
7 will -- Mr. Bogle's objection is well founded.

8 BY MR. COLLINS:

9 Q Over the course of the last 20 years,
10 can you tell me how the volume of opioids, what
11 it's been relative to the rest of the product
12 that's been moved?

13 MR. BOGLE: Object to form.

14 THE WITNESS: Two percent.

15 BY MR. COLLINS:

16 Q What other products besides controlled
17 substances does the distribution center
18 distribute?

19 A We sell pharmaceuticals, legend drugs,
20 over-the-counter merchandise, some medical
21 devices, everything from syringes to -- we used to
22 sell wheelchairs and that, but we got out of that
23 business locally. But we would sell anything you
24 would see in a pharmacy.

1 Q How significant in terms of the
2 resources are controlled substance to your daily
3 distribution needs?

4 MR. BOGLE: Object to form.

5 THE WITNESS: Currently we have about 10
6 or 12 people that do nothing but the controls. I
7 have two clerks that do nothing but the paper 222
8 forms or sorting those out, and I have one that
9 answers the phone and balances those edits. We
10 send an edit every day to the DEA, electronically.
11 I believe it's the Philadelphia office.

12 BY MR. COLLINS:

13 Q Let's take an opioid that is received in
14 your distribution center, and I'd like you to
15 describe how it's received, how it's handled, how
16 it's stored, and how it's then further
17 distributed.

18 MR. BOGLE: Objection. Form, compound.

■ [REDACTED] [REDACTED]

■ [REDACTED] [REDACTED]

■ [REDACTED] [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED] [REDACTED]

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[REDACTED]

16 BY MR. COLLINS:

17 Q I'm going to hand you a series of
18 photographs and ask you to identify them for me.

19 A Okay.

20 Q They've been premarked as Exhibits 2
21 through -- 2 through 11. So I'm going to hand you
22 each of those, and I want you to tell me -- I'll
23 hand them to you. You can have a seat.

24 I'm sorry, 53 through 62.

1 (Snider Exhibits No. 53 through 62
2 were marked for identification.)

3 BY MR. COLLINS:

4 Q So I'm handing you 53. Do you recognize
5 what's depicted in Exhibit 53?

6 A Yes.

7 Q What is it?

8 A This is our control substance cage for
9 Class III, IV and V merchandise.

10 Q And where is that perspective from?

11 A It's from the mezzanine level looking
12 down.

13 Q And does that fairly and accurately
14 depict the cage --

15 A Yes.

16 Q -- in its current state?

17 A Yeah, the bottom right is our
18 self-closing door. And then I'll -- which has a
19 scanner on it so we know only people can enter
20 that are accessed to that. And there's quite a
21 bit of -- well, you don't see the security here,
22 but there's quite a bit there.

23 Q Let me hand you what's been premarked as
24 Exhibit 54. Can you identify what's depicted in

1 premarked as Exhibit 55. Describe what -- tell me
2 if you identify -- can identify what's in that
3 picture.

Age Group	Don't know	Not a good idea	A good idea	A very good idea	A great idea
18-24	10%	10%	20%	30%	30%
25-34	10%	10%	20%	30%	30%
35-44	10%	10%	20%	30%	30%
45-54	10%	10%	20%	30%	30%
55-64	30%	10%	20%	30%	10%

11 Q Let me show you what's been -- I'm going
12 to -- actually, does that fairly and accurately
13 depict the area that you just described?

14 A Yes.

15 Q I'm going to hand you what's been
16 premarked as Exhibit 56.

17 A Thank you.

18 Q Do you recognize what's depicted in
19 Exhibit 56?

20 A Yes, I do.

21 Q What is it?



Figure 1 illustrates the experimental design. The trial sequence is as follows:

- Fixation:** A fixation cross is displayed for 200 ms.
- Stimulus:** A word is presented for 200 ms.
- Response:** The participant presses a button for 200 ms.
- Feedback:** A green or red light is displayed for 200 ms.
- Repeat:** The trial is repeated for 10 trials.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8 Q You -- you indicated this -- well, does
9 this fairly and accurately depict the area you
10 just described?

11 A Yes.

12 Q You indicated this is relatively recent.
13 What did you have there before?

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

█ [REDACTED]

2 Q Let me show you what's been premarked as
3 Exhibit 57, and ask you to tell me whether you can
4 identify that.

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

10 Q Does it fairly and accurately depict
11 that area you just described?

12 A Yes.

13 Q I want to show you -- hand you what's
14 been premarked as Exhibit 58. Ask you to identify
15 or tell me whether you can identify that.

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

[REDACTED]

[REDACTED]

3 Q And when you say '13 or '14, 2013 and
4 2014?

5 A Yes.

6 Q And who has access to this area?

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

7 Q Let me show you what's been premarked as
8 Exhibit 59. Can you identify what's in Exhibit 59
9 for me?

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

17 Q Does this fairly and accurately depict
18 the area you just described along with these
19 cages?

20 A Yes.

21 Q I show you what's been premarked as
22 Exhibit 60. Ask you to identify what's depicted
23 there, if you can.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

14 Q And does it fairly and accurately depict
15 the area you just described?

16 A Yes, it does.

17 Q I'm showing you what's been premarked as
18 Exhibit 61. Please tell me whether you can
19 identify this area for me.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

12 Q And I don't recall if I already asked
13 you, but does this fairly and accurately depict
14 the area you just described?

15 A Yes.

16 Q I'm showing you what's been premarked as
17 Exhibit 62. Ask you to identify what's depicted
18 in Exhibit 62.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

9 Q Other than that one occasion I think you
10 said in 2010 where you had an employee that was
11 involved in some theft, have you ever had any
12 other type of incident at your distribution
13 center?

14 A Yes, we had -- up in Cleveland, someone
15 approached one of the drivers with a gun, and he
16 actually yelled for them to get out, and they
17 actually did. But they asked him to open the back
18 of his truck, which is always locked, and produce
19 the totes. And he actually used to run a
20 Mini-Mart is how he did that.

21 And I know that because our delivery
22 service has worked for me for almost 40 years, and
23 it's a dedicated delivery service, and no other
24 wholesaler has that. And these guys carry

1 scanners so they can scan the totes. We know when
2 they bring them back how many totes were
3 delivered. They call if there's an error, they
4 had ten instead of nine. So we investigate that,
5 et cetera. But the drivers have been dedicated
6 service only for McKesson totes, which I think is
7 a differentiator for us.

8 Q Do you see any totes in this Exhibit --
9 is it 62?

[REDACTED]

16 Q And does this fairly and accurately
17 depict the -- sort of the various views of the
18 cameras?

19 A Yes.

[REDACTED]

A horizontal bar chart with 20 rows. Each row has a small square icon on the left, followed by a text label, and then a horizontal bar representing a percentage. The bars are gray. The categories and their approximate percentages are as follows:

Category	Percentage
1. [Icon] [Label]	45%
2. [Icon] [Label]	85%
3. [Icon] [Label]	35%
4. [Icon] [Label]	88%
5. [Icon] [Label]	92%
6. [Icon] [Label]	92%
7. [Icon] [Label]	88%
8. [Icon] [Label]	88%
9. [Icon] [Label]	82%
10. [Icon] [Label]	25%
11. [Icon] [Label]	95%
12. [Icon] [Label]	55%
13. [Icon] [Label]	88%
14. [Icon] [Label]	60%
15. [Icon] [Label]	45%
16. [Icon] [Label]	45%
17. [Icon] [Label]	90%
18. [Icon] [Label]	75%
19. [Icon] [Label]	15%
20. [Icon] [Label]	92%
21. [Icon] [Label]	92%
22. [Icon] [Label]	75%
23. [Icon] [Label]	88%

A horizontal bar chart with 20 rows. Each row has a small square icon on the left, followed by a text label, and then a horizontal bar representing a percentage. The bars are gray. The categories and their approximate percentages are as follows:

Category	Percentage
1. Overall satisfaction	85%
2. Service quality	78%
3. Product variety	92%
4. Price competitiveness	70%
5. Delivery speed	88%
6. Customer support	65%
7. Website usability	72%
8. Mobile app experience	60%
9. Return policy	75%
10. Loyalty program	82%
11. Packaging quality	80%
12. Shipping reliability	77%
13. Product quality	90%
14. Customer loyalty	73%
15. Brand reputation	87%
16. Social media presence	68%
17. Environmental impact	71%
18. Ethical sourcing	79%
19. Community engagement	63%
20. Future growth potential	84%

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10 Q Does the distribution center communicate
11 with local DEA?

12 A Yes.

13 Q How often?

14 A Not as much right now, but they will
15 call me. I talked to Patty Robson last week. And
16 I also used to talk to Kurt Dittmer quite a bit
17 before he retired. And I've known these folks for
18 a long time, and I would probably say at least
19 twice a month there was some contact.

20 Q Has the DEA -- the local DEA ever given
21 you a complaint about the operation of the
22 distribution center?

23 MR. BOGLE: Object to form.

24 THE WITNESS: They've never.

1 BY MR. COLLINS:

2 Q I'm sorry?

3 A No, they have never.

4 Q In earlier questioning by Mr. Bogle, he
5 mentioned a settlement agreement with the -- the
6 Justice Department. Do you recall that?

7 A Yes.

8 Q Do you know if the New Castle
9 Distribution Center was mentioned in that
10 settlement agreement?

11 A I know it was not.

12 (Snider Exhibit No. 64 was marked
13 for identification.)

14 BY MR. COLLINS:

15 Q I'm going to show you what's been
16 premarked as Exhibit 64.

17 Do you recognize that document?

18 A Yes.

19 Q What is it?

20 A It's the controlled substance compliance
21 process.

22 Q And what's the purpose of this document?

■ ■ [REDACTED]

■ [REDACTED]

[illegible]

[illegible]

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415	416	417

[illegible]

[illegible]

1 Q When the New Castle Distribution Center
2 first became operational in 2000, did you have
3 access to customer information in terms of who
4 else was supplying them?

5 A No, I didn't.

6 MR. BOGLE: Object to form.

7 BY MR. COLLINS:

8 Q Do you have that now?

9 A The DRAs have all the access to that,
10 yes.

11 Q And when did that start?

12 A I'm -- I'm not sure if that was 2008,
13 but -- with the Lifestyle drugs, but I know that
14 the fact that they could see the wholesalers'
15 information, I think Izzy told me it was just
16 within the last few years.

17 (Snider Exhibit No. 66 was marked
18 for identification.)

19 BY MR. COLLINS:

20 Q I'm going to show you what's been now
21 premarked as Exhibit 66, and ask you to identify
22 it for me.

23 What is Exhibit 66?

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

12 Q You've mentioned the director of
13 Regulatory Affairs a number of times. What's his
14 or her role?

15 MR. BOGLE: Object to form.

16 THE WITNESS: They're vetting out the
17 regulations and the customers that we either
18 onboard or sell to.

19 BY MR. COLLINS:

20 Q Given your almost four decades of
21 experience with McKesson, including almost 20
22 years as the director of operations of the New
23 Castle Distribution Center, what do you think
24 about all of these allegations about McKesson

1 fueling the opioid crisis?

2 MR. BOGLE: Object to form.

3 THE WITNESS: I spent most of my life in

4 Summit County. I know Cuyahoga County. I'm

5 probably the last Browns' fan you'll ever meet.

6 So it means a lot to me, and I would never do

7 anything willingly to create an opiate crisis.

8 I -- I feel it is terrible and I feel bad for it,

9 but I don't say that I caused it at -- at New

10 Castle.

11 BY MR. COLLINS:

12 Q Besides your handling of distribution of

13 pharmaceuticals in a routine way, are you aware of

14 any other things that you've done as a head of

15 operations at the distribution center --

16 MR. BOGLE: Object.

17 BY MR. COLLINS:

18 Q -- that would impact the community?

19 MR. BOGLE: Object to form.

20 THE WITNESS: Yeah, I guess that's where

21 I say about some of the things we do.

22 I know in -- I think it was Summit

23 County, Stark County, there was a meningitis

24 outbreak several years ago, and one of the high

1 school kids, one or two of them died, and so we
2 had to provide the antidote or the medicine for
3 that. And I called in helicopters, and they
4 landed in the parking lot and they distributed to
5 the County Board of Health, I believe it was, and
6 one of the hospitals. And that's kind of what we
7 do.

8 I also -- just recently one of my
9 managers from UPMC Pittsburgh Hospital, they had a
10 snake bite, and they must have been in central PA.
11 I'm not sure how that happened. But we -- he
12 didn't know if the courier could get there quick
13 enough, so he grabbed it and drove it down
14 himself, and that saved the kid.

15 And then we were in McKesson Today for
16 New Castle recently for the Washington Courthouse
17 distribution center in Ohio that we provided and
18 had a life-saving medicine, and my manager drove
19 it halfway, they had someone pick it up, and it
20 saved the patient. It was a mother who was
21 pregnant and needed this medicine to save the
22 baby, and I know that's what we did.

23 It was written up in the McKesson Today,
24 et cetera, and Bev did most of the work. I just

1 was standing there. But that's the kind of thing
2 we do that I wanted to make sure I got on the
3 record.

4 MR. COLLINS: I have no further
5 questions. You want to switch?

6 MR. BOGLE: Yeah, just give me a couple
7 of minutes.

8 THE VIDEOGRAPHER: The time is 5:55 p.m.
9 We're going off the record.

10 (Recess.)

11 THE VIDEOGRAPHER: The time is 6:02
12 p.m., and we're back on the record.

13 RE CROSS-EXAMINATION

14 BY MR. BOGLE:

15 Q All right. Mr. Snider, I have a few
16 follow-up questions for you.

17 You made reference to opioids being
18 2 percent of the overall volume at your
19 distribution center. Do you recall that
20 testimony?

21 A Yes. At one time, yes.

22 Q Yeah, that number has not been stagnant,
23 right? For example, when you started in 2000,
24 that number increased over time, didn't it?

1 MR. COLLINS: Objection. Vague.

2 THE WITNESS: Over time, yes, it did.

3 BY MR. BOGLE:

4 Q Right. So when you say that opioids
5 were 2 percent of the total volume at New Castle,
6 you're not representing to our jury that that was
7 true for the entire period of 2008 -- or 2000 to
8 present, right?

9 A No. I just got the data from present.

10 Q From today?

11 A Recently.

12 Q Right. So, for example, you have the
13 2018 data is what you're talking about.

14 A Yes.

15 Q Okay. And it was higher than that, for
16 example, in 2010.

17 A I don't -- I don't know that, what it
18 was.

19 Q You don't know. So you didn't check
20 anything other than 2018.

21 A Correct.

22 Q Okay. You provided some -- some
23 testimony about -- to the effect that the DEA has
24 never had any complaints about any activities

1 involving New Castle. Is that right?

2 A Yes.

3 Q Okay. Have you reviewed any of the DEA
4 and DOJ letters that led to the -- the \$150
5 million settlement agreement?

6 A I looked at them, yes, briefly.

7 Q Did you just look at the settlement
8 agreement, or did you look at any of the internal
9 letters that led up to that?

10 A I looked at the distribution centers
11 listed.

12 Q Okay. Did you review the letters in
13 detail beyond that?

14 A No.

15 Q Okay. So, for example, if the -- some
16 of the letters from the DEA indicate that they
17 found nationwide and systemic violations regarding
18 controlled substance monitoring at McKesson,
19 that's something you were not aware of when you
20 provided that testimony, right?

21 MR. COLLINS: Objection. Assumes facts
22 not in evidence. Lack of foundation.

23 BY MR. BOGLE:

24 Q Right?

1 A Can you ask me -- I'm not sure what you
2 mean by --

3 Q Sure.

4 A -- "provided that testimony."

5 Q You provided testimony there's been no
6 complaints about -- about New Castle from the DEA.

7 A Yes.

8 Q And my question to you was, did you
9 review any of these letters from the DEA to assess
10 whether they made any comments about the fact that
11 they found nationwide and systemic violations as
12 to McKesson's suspicious order monitoring
13 programs?

14 MR. COLLINS: Object to form.

15 THE WITNESS: I did not discuss it with
16 the DEA.

17 BY MR. BOGLE:

18 Q No, I'm talking about in the letters.
19 Did you see that in the letters anywhere?

20 MR. COLLINS: Objection. I'm not
21 sure --

22 BY MR. BOGLE:

23 Q All right. Let's just take a look at
24 one.

1 A No, I didn't.

2 Q Okay. Let's take a look at one.

3 A I thought you said did I review it with
4 the DEA. That's what I heard.

5 Q All right. That's fine.

6 (Snider Exhibit No. 67 was marked
7 for identification.)

8 BY MR. BOGLE:

9 Q Exhibit 67, I'm going to hand you here,
10 also marked as 1.1443.

Age Group	Percentage
18-24	10%
25-34	15%
35-44	20%
45-54	25%
55-64	30%
65-74	35%
75-84	40%
85+	45%

Age Group	Percentage
18-24	10%
25-34	15%
35-44	20%
45-54	25%
55-64	20%
65-74	15%
75-84	10%
85+	5%

Age Group	Percentage
18-24	10%
25-34	25%
35-44	35%
45-54	20%
55-64	10%
65-74	5%
75-84	5%
85+	5%

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10 Q Okay. When you looked through the DEA
11 correspondence prior to testifying today, do you
12 recall reading that statement?

13 MR. COLLINS: Objection. Lack of
14 foundation. Form.

15 THE WITNESS: No, I don't.

16 BY MR. BOGLE:

17 Q You don't. Okay.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

7 Q Okay. Do you recall seeing that in the
8 letter that you reviewed?

9 MR. COLLINS: Objection. Asked and
10 answered.

11 THE WITNESS: No.

12 BY MR. BOGLE:

13 Q You reviewed quite a few photos of the
14 New Castle Distribution Center. Do you recall
15 that?

16 A Yes.

17 Q Okay. Now, those photos all pertain to
18 security measures contained within your facility
19 at New Castle, right?

20 A Yes.

21 Q Okay. None of those photos pertain to
22 anything that involved trying to make sure that
23 the controlled substances once they are sold get
24 into the right hands, right?

[REDACTED]

18 Q You talked too about these -- these
19 totes that the controlled substances are carried
20 in. Do you recall discussing that generally?

21 A Yes.

22 Q And I think you said something about
23 having dedicated drivers delivering these totes,
24 and that was something that you thought

1 differentiated McKesson from other wholesalers.

2 Am I summarizing that fairly?

3 A Yes.

4 Q Okay. Now, you've had at New Castle
5 problems with lost totes that carried controlled
6 substances in them, right?

7 MR. COLLINS: Objection. Form.

8 THE WITNESS: No.

9 BY MR. BOGLE:

10 Q You've never lost a tote?

11 A I didn't say that. We don't have a
12 problem with it.

13 Q Okay. Well, we talked about Giant
14 Eagle, for example, earlier, right, and you recall
15 back in 2014 losing several totes that included
16 controlled substances for deliveries to Giant
17 Eagle, right?

18 A No, I don't.

19 Q You don't?

20 A Nope.

21 Q Okay. All right.

22 (Snider Exhibit No. 68 was marked
23 for identification.)

24 BY MR. BOGLE:

1 Q I'm going to hand you Exhibit 68, also
2 marked as 1.1878.

[illegible]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

15 Q That contained controlled substances.

16 A If you give me time to read it, I will.

17 I'm not -- it's HBC --

18 Q Sure. It's a one-page e-mail. Go
19 ahead.

20 A Sorry, there's other pages here. Okay.
21 (Peruses document.)

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

20 MR. COLLINS: Objection. Lack of
21 foundation.

22 THE WITNESS: Yes, from -- from someone
23 else.

24 BY MR. BOGLE:

1 Q Right. But it's -- it's certainly these
2 delivery drivers -- either delivery drivers or HBC
3 that lost these totes. We can agree on that,
4 right?

5 A Yes.

6 Q Okay.

7 A Also there's no manifest to show that.
8 So the -- I'm sure that Greg Carlson and the Giant
9 Eagle folks reported that to the DEA, that they
10 have missing totes, or I don't even know that they
11 found them at another store or where --

12 Q Right. You don't know either way,
13 right?

14 A No.

15 Q But you do agree with me this discusses
16 missing totes?

17 MR. COLLINS: Objection. The question
18 is vague.

19 BY MR. BOGLE:

20 Q Right?

21 A Yeah.

22 MR. COLLINS: The question is vague.

23 BY MR. BOGLE:

24 Q Now, you talked about McKesson always

1 having standard operating procedures for
2 controlled substances.

3 Do you recall testifying to that a few
4 minutes ago?

5 A Yes.

The image displays a 15x15 grid of squares. Each square is either white or gray. The gray squares are located at the following (row, column) coordinates (starting from 0 at the top-left):

- Row 0: (0,1), (0,3), (0,10), (0,14)
- Row 1: (1,0), (1,4), (1,14)
- Row 2: (2,0), (2,10)
- Row 3: (3,2), (3,5), (3,13)
- Row 4: (4,2), (4,6), (4,14)
- Row 5: (5,0), (5,4), (5,12)
- Row 6: (6,0), (6,2)
- Row 7: (7,1), (7,3), (7,14)
- Row 8: (8,0), (8,14)
- Row 9: (9,0), (9,4)
- Row 10: (10,1), (10,3)
- Row 11: (11,1), (11,14)
- Row 12: (12,0), (12,14)
- Row 13: (13,0), (13,4), (13,12)
- Row 14: (14,0), (14,2)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

13 Q Okay. Now, you said that there were
14 reports sent to the DEA, unusual order reports, I
15 think you called them, from 2000 to 2006. Do you
16 recall that?

17 A Yes.

18 Q Do you have any documentary proof of
19 that at this point in time?

20 A No.

21 Q And you also said that at some point in
22 time, the D -- a DEA agent told you on the phone
23 that he didn't want daily unusual reports anymore.
24 Do you recall that?

1 A Yes.

2 Q Do you have any documentary proof of
3 that today?

4 A I don't have the e-mail. He actually
5 put it in writing for me.

6 Q But you don't have that, right?

7 A No, not from two -- whatever year that
8 was.

9 Q So we don't have any way to verify by
10 documentation either of those statements, do we?

11 MR. COLLINS: Objection. It's a
12 mischaracterization. You can ask the DEA.

13 THE WITNESS: From Kurt Dittmer would be
14 the only way to verify that.

15 BY MR. BOGLE:

16 Q We don't have any documentary evidence
17 that you can provide us as to providing reports
18 from 2000 to 2006, number one, right?

19 A Number one?

20 Q First thing. You can't point me to any
21 documents that show that you actually did what you
22 said you did?

23 A No, I don't have those e-mails from 2004
24 or whatever year it was.

1 Q And you don't -- and you don't have any
2 e-mail that you can show me or to the jury or to
3 anybody else about the DEA agent specifically
4 calling you and telling you that you didn't need
5 to provide daily reports anymore, correct?

6 A I don't have that.

7 Q You were asked about obtaining data from
8 other -- strike that.

9 You talked about being able to obtain
10 data regarding your customers receiving controlled
11 substances from other manufacture -- other --
12 other wholesalers. Do you recall that?

13 A Yes.

14 Q And you talked about when you thought
15 that was available, and I won't go back into the
16 exact years, but you recall talking about a
17 timeline --

18 A Yes.

19 Q -- when you thought that was available,
20 right?

21 A Yes.

22 Q The bottom line is, McKesson at all
23 times was able to ask the customer for that data,
24 right?

1 MR. COLLINS: Objection. Compound,
2 argumentative.

3 THE WITNESS: I don't know that.

4 BY MR. BOGLE:

5 Q You don't know whether McKesson at all
6 times could ask their own customers, Listen, give
7 me all of the drugs that you're getting from all
8 the wholesalers, give me proof of that, I want to
9 see?

10 A From 2000 on, I don't know that -- if
11 that was legally feasible.

12 Q Legally feasible?

13 A Yeah, I don't know --

14 Q You've asked --

15 A -- if we could legally give them the
16 other wholesalers' information.

17 Q Do you recall anybody ever asking, that
18 you were aware of?

19 MR. COLLINS: Objection to form.

20 THE WITNESS: Yes.

21 BY MR. BOGLE:

22 Q You recall somebody asking for it?

23 A Yes.

24 Q And somebody saying that was legally not

1 possible?

2 A No.

3 Q Okay. So -- but what you do know is you
4 guys can get it today, right?

5 A I -- yes, as he showed me.

6 Q Any -- are you aware of any changes to
7 the laws that would allow it today that didn't
8 exist before?

9 MR. COLLINS: Objection. Calls for a
10 legal conclusion, among other things.

11 THE WITNESS: I don't know anything
12 about the laws, no, right now on that.

13 BY MR. BOGLE:

14 Q Okay. Well, you talked about the fact
15 that you guys could get it. I'm just trying to
16 follow up on that.

17 A It depends --

18 MR. COLLINS: I'm sorry, is that -- I'm
19 not sure that's a question.

20 MR. BOGLE: No, it's not. It's just a
21 comment.

22 BY MR. BOGLE:

23 Q Now, you talked about blocked orders and
24 suspicious order reports generally. Do you recall

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[REDACTED]

[illegible]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

15 MR. COLLINS: Objection. Lack of
16 foundation what this --

17 BY MR. BOGLE:

18 Q So you don't know what this report is
19 even about?

20 MR. COLLINS: I'm sorry, let me finish
21 my objection. Lack of foundation. You haven't
22 established this witness's knowledge as to what
23 this document --

24 BY MR. BOGLE:

1 Q Geez, it should, man. I mean, you don't
2 know when orders were blocked from your
3 distribution center?

4 MR. COLLINS: You don't have to answer
5 that.

6 BY MR. BOGLE:

7 Q No, you do. You don't know that?

8 MR. COLLINS: Actually -- actually, lack
9 of foundation. You haven't established this
10 witness has any knowledge about this document. He
11 keeps telling you he doesn't know anything about
12 the document, and you keep asking him questions
13 about a document he doesn't know anything about.

14 THE WITNESS: I don't know anything
15 about this document, and you say it's a blocked
16 item document, and this cover page is on it, but
17 I've never seen this before.

18 BY MR. BOGLE:

19 Q I put the cover page on there.
20 Everything else --

21 A Oh --

22 Q -- is provided to us by --

23 A -- I did not know that.

24 Q That's a summary of the data included in

1 there.

2 A If you say so, but I don't -- can't
3 testify to that.

4 Q Okay. You have no reason to dispute the
5 accuracy of either of those statements, do you, on
6 the first page?

7 MR. COLLINS: Objection. Lack of
8 foundation.

9 BY MR. BOGLE:

10 Q Do you?

11 MR. COLLINS: Objection. Lack of
12 foundation.

13 THE WITNESS: I don't trust what you put
14 on here.

15 BY MR. BOGLE:

16 Q You don't trust what I put on there?

17 A No.

18 Q Show me where I'm wrong in the document.

19 A I don't know the document.

20 Q Okay. You don't have any idea, right?

21 MR. COLLINS: Objection. Argumentative.

22 MR. BOGLE: No further questions.

23 MR. COLLINS: Actually I have a couple
24 of follow-ups.

1 have been their manifest.

2 But Barb is trying to find out because
3 she's doing due diligence to make sure controls
4 don't get out on the street.

5 BY MR. BOGLE:

6 Q Does this document reflect that McKesson
7 lost totes?

8 A No.

9 MR. BOGLE: Object to form.

10 MR. COLLINS: No further questions.

11 MR. BOGLE: All right, we're done.

12 THE VIDEOGRAPHER: All right. The time
13 is -- sorry, anything else?

14 MR. BOGLE: No, I'm good.

15 MR. COLLINS: We're good.

16 THE VIDEOGRAPHER: Anybody on the phone
17 either?

18 I just want to make sure --

19 MR. COLLINS: I didn't even know -- was
20 there anybody participating by phone?

21 THE VIDEOGRAPHER: The time is
22 6:23 p.m., November 8, 2018.

23 Going off the record, completing the
24 videotaped deposition.

1 (Whereupon, the deposition of
2 BLAINE M. SNIDER was concluded
3 at 6:23 p.m.)
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1 CERTIFICATE OF CERTIFIED SHORTHAND REPORTER

2 The undersigned Certified Shorthand Reporter
3 does hereby certify:

4 That the foregoing proceeding was taken before
5 me at the time and place therein set forth, at
6 which time the witness was duly sworn; That the
7 testimony of the witness and all objections made
8 at the time of the examination were recorded
9 stenographically by me and were thereafter
10 transcribed, said transcript being a true and
11 correct copy of my shorthand notes thereof; That
12 the dismantling of the original transcript will
13 void the reporter's certificate.

14 In witness thereof, I have subscribed my name
15 this date: November 13, 2018.

16

17

18 _____
LESLIE A. TODD, CSR, RPR

19 Certificate No. 5129

20 (The foregoing certification of
21 this transcript does not apply to any
22 reproduction of the same by any means,
23 unless under the direct control and/or
24 supervision of the certifying reporter.)

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Please read your deposition over carefully and make any necessary corrections. You should state the reason in the appropriate space on the errata sheet for any corrections that are made.

After doing so, please sign the errata sheet and date it.

You are signing same subject to the changes you have noted on the errata sheet, which will be attached to your deposition. It is imperative that you return the original errata sheet to the deposing attorney within thirty (30) days of receipt of the deposition transcript by you. If you fail to do so, the deposition transcript may be deemed to be accurate and may be used in court.

1	-	-	-	-	-	-
2	E	R	R	A	T	A
3	-	-	-	-	-	-

4 PAGE LINE CHANGE

5 _____

6 REASON: _____

7 _____

8 REASON: _____

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12 REASON: _____

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14 REASON: _____

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16 REASON: _____

18 REASON: _____

20 REASON: _____

22 REASON: _____

24 REASON: _____

ACKNOWLEDGMENT OF DEPONENT

I, _____, do hereby
certify that I have read the foregoing pages, and
that the same is a correct transcription of the
answers given by me to the questions therein
propounded, except for the corrections or changes
in form or substance, if any, noted in the
attached Errata Sheet.

BLAINE M. SNIDER

DATE

Subscribed and sworn to

before me this

_____ day of _____, 20____.

My commission expires: _____

Notary Public